2010

Compliance Calendar for Gasoline Dispensing Facilities

Created by the Wisconsin Department of Commerce
Small Business Clean Air Assistance Program

commerce.wi.gov

Wisconsin Department of Commerce

SMALL BUSINESS ENVIRONMENTAL ASSISTANCE PROGRAMS

Serving Small Businesses and the Environment

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Welcome!

Welcome to the second edition of our compliance calendar for gasoline dispensing facilities. The Wisconsin Small Business Clean Air Assistance Program (SBCAAP) developed this calendar to help gas stations and gasoline dispensing facilities comply with environmental requirements related to the transfer of fuel. We hope this calendar will be a helpful tool for meeting your requirements for inventory tracking, leak detection, and vapor recovery, especially for your record keeping obligations.

Our calendar summarizes requirements of:

- ***US Environmental Protection Agency*** (EPA) standards for gasoline dispensing facilities,
- ***Wisconsin Department of Natural Resources*** (DNR) regulations regarding emissions of gasoline vapor from petroleum and gasoline sources, and
- ***Wisconsin Department of Commerce*** regulations for gasoline storage tanks and piping.

New federal EPA requirements took effect in January 2008, and information about the regulations is included in this calendar. EPA just (December 15, 2009) proposed to make numerous changes to the regulations, including:

- clarifying the definitions of gasoline, gasoline dispensing facilities, storage tanks;
- clarifying the definition of monthly gasoline throughput and how to calculate it; and
- clarifying some testing, monitoring, and record keeping requirements.

We have identified the proposed changes in this year's edition of the calendar (look for the notation [*proposed 12-15-2009*]) and may know more about when any changes would be finalized by the end of 2010.

Wisconsin's Comm 10 rule for storage tanks was revised in February 2009, and many of the deadlines for Comm 10 will be phased in over the next several years. Gas stations and gasoline dispensing facilities should pay special attention to deadlines for underground storage tanks that are approaching soon:

- February 1, 2011 — Auto shut-off overfill protection
- January 1, 2012 — Designation of operator classes and operator training

We have included more information about the Comm 10 requirements and the approaching deadlines in this year's calendar also.

The calendar provides space for recording your gasoline throughput totals and keeping track of your regular leak detection inspections. Both inventory tracking and regular equipment inspections are required by the regulations. This calendar provides a simple way for keeping all your records together. Keep the calendar on file for five years and it can serve as your official record.

The Small Business Clean Air Assistance Program provides confidential, non-regulatory and free information to Wisconsin small businesses to help them understand their air pollution compliance requirements. The program has fact sheets, recordkeeping and reporting tools, EPA compliance documents and videos, required forms, and permit applications, all available free of charge.

If you have questions or comments regarding this calendar, or you would like to obtain additional copies, please feel free to contact the SBCAAP.

Table of Contents

Understanding the Regulations Affecting Gas Stations, and How this Calendar Can Help

Gasoline vapors contain Volatile Organic Compounds (VOCs) and several Hazardous Air Pollutants (HAPs), like benzene. Filling gasoline storage tanks can release these compounds to the air. Benzene, for example, is among the 30 HAPs that have been identified to pose the greatest public health risk in urban areas. Exposure to benzene can cause drowsiness, dizziness and even unconsciousness. Long term exposure to benzene can cause anemia and leukemia.

Leak detection and vapor control are among the methods that gasoline dispensing facilities use to reduce the emissions of HAPs like benzene into the air.

In Wisconsin, gas stations and other gasoline dispensing facilities are affected by numerous regulations. Several of the important ones include:

- US Environmental Protection Agency (EPA) ***National Emission Standards for Hazardous Air Pollutants*** (NESHAP) for gasoline dispensing facilities (40 CFR part 63, subpart CCCCCC). This rule regulates vapor control during filling of gasoline storage tanks.

- Wisconsin Department of Natural Resources (DNR) regulations regarding ***Control of Organic Compound Emissions from Petroleum and Gasoline Sources*** (Ch. NR 420, Wis. Adm. Code). This rule regulates vapor control in some Wisconsin counties, both during filling of gasoline storage tanks and refueling of motor vehicles.

- Wisconsin Department of Commerce regulations for ***Flammable, Combustible and Hazardous Liquids*** (Ch. Comm 10, Wis. Adm. Code). This rule regulates gasoline storage tanks and associated piping.

Many facilities may be affected by rule requirements for the first time, because some of these regulations have changed recently. New federal EPA regulations took effect on January 10, 2008; new facilities must comply by January 10, 2008 or upon startup, and existing facilities must comply by January 10, 2011. Changes to Wisconsin's Comm 10 regulations took effect on February 1, 2009, with several additional deadlines being phased in over the next few years.

Who is affected by these regulations?

The federal EPA regulations affect "area sources," all gasoline dispensing facilities that emit less than 10 tons per year of a single toxic air pollutant or less than 25 tons per year of any combination of toxic air pollutants. Most gas stations will fall into this group.

Wisconsin's emissions regulations (NR 420) mainly affect facilities located in 20 Wisconsin counties (Brown, Calumet, Dane, Dodge, Door, Fond du Lac, Jefferson, Kenosha, Kewaunee, Manitowoc, Milwaukee, Outagamie, Ozaukee, Racine, Rock, Sheboygan, Walworth, Washington, Waukesha and Winnebago counties). Gas stations in those counties are required to employ certain types of vapor control systems. The specific requirements depend on your location and the amount of gasoline dispensed at your facility.

Wisconsin's regulations for flammable, combustible and hazardous liquids (Comm 10) affect businesses that sell gasoline or other liquid motor fuels. Most gas stations with gasoline storage tanks are affected by this rule.

What's required?

The different regulations cover different areas of your business but generally are aimed at achieving the following goals:

- ***Minimize vapor releases (of gasoline vapor from storage tanks and dispensing equipment)***

All gasoline dispensing facilities, regardless of size, must implement management practices that will minimize vapor releases to the atmosphere. The particular vapor control requirements that apply to each facility may depend on the amount of gasoline dispensed at the facility.

- ***Minimize leaks (of liquid gasoline from gasoline storage tanks, piping and dispensing equipment)***

The regulations for minimizing gasoline leaks involve regular inspections to monitor equipment function, and leak checks for rapid detection of any leaks in the equipment.

- ***Perform testing and compliance demonstration***

Some facilities are required to test the vapor balance system and equipment to demonstrate compliance with regulations. In addition, your facility may be required to measure the leak rate and cracking pressure of pressure-vacuum vent valves on gasoline storage tanks.

■ ***Perform record keeping and reporting***

Record keeping requirements include tracking and verifying your gasoline inventory, keeping records of regular equipment tests and, for some facilities, keeping records of any required employee training. Facilities may be required to file Initial Notification and Notification of Compliance Status reports also.

In Wisconsin, some requirements for vapor control depend on a facility's location, as mentioned above. Requirements may also vary depending on the quantity of gasoline dispensed at your facility. Facilities with higher throughput of gasoline have more stringent requirements for vapor control.

The requirements depend on your location and the amount of gasoline pumped at your facility, and may include:

- ❑ daily gasoline inventory tracking and verification
- ❑ weekly equipment inspections
- ❑ monthly equipment and facility inspections
- ❑ yearly equipment testing
- ❑ yearly permit and insurance renewals
- ❑ periodic tank testing (at longer intervals)

Why must gas stations inspect storage tanks and equipment?

Properly installed and maintained underground storage system equipment is durable and reliable. However, daily wear and tear, as well as exposure to corrosive effects of soil, water, and stored product and seasonal extremes of heat and cold, can degrade or damage storage system components and cause product releases or equipment failure. The purpose of inspecting the storage system equipment is to identify any noticeable deterioration or apparent malfunction in the portion of the equipment visible beneath grade-level access covers located over or near the top of the underground storage tank and at the fuel dispensers.

Required regular inspections help to protect the public, facility employees, and the environment from the hazards posed by the release of flammable or combustible liquids and exposure to toxic motor fuels. They also can save money by allowing facilities to identify leaks of stored fuel.

Why is leak detection important?

Leak detection can help your business in numerous ways. Among other things, leak detection can:

- ❑ reduce or eliminate loss of product (whether from theft or leaks);
- ❑ reduce fire and explosion threats;
- ❑ reduce and/or eliminate contamination of soil, groundwater, streams, rivers, lakes and drinking water; and
- ❑ reduce liability.

What can this calendar do?

We have designed this calendar to provide you with information about what's required to comply with these regulations and especially to help you track and meet your record keeping obligations.

The fact sheet sections at the back of the calendar can help you identify which requirements apply to your facility. We also have provided links to the regulatory agencies, sources of information, and offices that can assist gasoline dispensing facilities with their regulatory requirements.

You can use the calendar to keep track of, and remind yourself about, any important dates you need to remember. Mark the calendar so you'll remember when your tank use permits are due, when your tank insurance is due, and any dates when your equipment testing is required.

You can also use the calendar to keep track of your regular inspections and leak detection monitoring. Each month of the calendar contains space where you can record your inspections and also keep a maintenance and repair log for your equipment. At the back of the calendar, we have provided reference materials that include sample checklists for your weekly and monthly inspections.

This calendar can also help with your inventory tracking and verification. The back of the calendar contains a sample worksheet for recording your daily gasoline inventory; we have also provided a link to an electronic version of this worksheet if you prefer to use that. In addition, each month provides space for you to summarize your monthly total amounts of gasoline delivered and dispensed. These records are required by both Wisconsin's state regulations and the federal regulation.

If you save this calendar, it can serve as part of your official record. Keep this and other records at your facility for 5 years.

Please let us know of any suggestions for additions or modifications that will make this calendar more helpful for you. Thank you!

Wisconsin Department of Commerce
Small Business Clean Air Assistance Program

Instructions for Using the Record Keeping Pages in this Calendar

Each month, check if you have any deadlines approaching for renewing permits, your tank insurance, compliance testing, and employee training. Remind yourself to meet all important dates and deadlines by marking your calendar!

Reminders—Permits, Insurance, Testing and Training		
Are tank permits up to date?	Yes	No
Is tank insurance due this month?	Yes	No
Is any equipment testing due this month? Are most recent test results on site?	Yes	No
If employee training is required at your facility, is all training up to date for current employees?	Yes	No

Use this table to keep a record of your required monthly inspections. Read the complete Monthly Inspection Checklist on page 50 for information about what to look for. Then record your inspection results for each month on this table. Each person who conducts the inspection should initial their entries in the table.

• Attach monthly inventory worksheet(s) or printout(s) here •

If you prefer to keep your monthly inventory worksheets or ATG strips with this calendar, attach them to the record keeping page for each month.

Monthly Inspection, Condensed Record (perform by end of each month or 30 days apart)

Inspection Area (*see page 50 for complete checklist*)	Inspected?	Repaired?	Logged on Maintenance Record?	Inspected by? (initials)
Underground Storage Tanks and Gasoline Dispensing Equipment (includes Stage I vapor control system for facilities in Stage I areas)				
Release detection system	Y N	Y N	Y N	
Spill buckets	Y N	Y N	Y N	
Overfill alarm	Y N	Y N	Y N	
Impressed current system	Y N	Y N	Y N	
Fill and monitoring ports	Y N	Y N	Y N	
Spill and overfill response supplies	Y N	Y N	Y N	
Dispenser hoses, nozzles, and breakaways	Y N	Y N	Y N	
Dispensers and dispenser sumps	Y N	Y N	Y N	
Piping sumps	Y N	Y N	Y N	
Gasoline Dispensing Equipment at Facilities in Stage II Vapor Recovery Areas				
Vapor return line	Y N	Y N	Y N	
Nozzle bellows	Y N	Y N	Y N	
Nozzle faceplates/facecones	Y N	Y N	Y N	
Nozzles	Y N	Y N	Y N	
Vapor processing unit working properly	Y N	Y N	Y N	

Monthly Gasoline Throughput Summary

Product Type	Amount Delivered	Amount Dispensed	Within Variance?
	+	+	Y N
	+	+	Y N
	+	+	Y N
	+	+	Y N
Monthly Totals	=	=	

Use this table to summarize the monthly gasoline throughput at your facility. For each tank (or product), record the total amounts of gasoline delivered into, and dispensed from, that tank during the month. Mark Y if the tank is within the allowable variance for the month. For more information about inventory recording and verification, and for help with the calculations, see the worksheet on page 52 of this calendar.

Facilities that are required to conduct weekly inspections (those in the Stage II vapor recovery area) can use this table to keep a log of their inspections. Record the date of each weekly inspection. The person who conducts the inspection should initial the table.

Weekly Inspection Record

Inspection Date	Inspected by (initials)

System Maintenance and Repair Record

Inspection Date	Name of Inspector	Identify Problem/Defective Part	Repair Date	Replacement Part Manufacturer/Part Number

Use this table to help meet your requirement to keep a system maintenance and repair log. Record the date when you conducted your inspection and the name of the person who inspected the equipment. Then record information about the problem or defective part discovered, the date you repaired the equipment, and the manufacturer and part number of any parts replaced. If you prefer to keep your documentation of repairs in a separate file, you can use this table to record the date of repairs and to note the location where the complete explanation and record is stored in your files.

January 2010

• Attach monthly inventory worksheet(s) or printout(s) here •

Reminders—Permits, Insurance, Testing and Training

Are tank permits up to date?	Yes No
Is tank insurance due this month?	Yes No
Is any equipment testing due this month? Are most recent test results on site?	Yes No
If employee training is required at your facility, is all training up to date for current employees?	Yes No

Monthly Gasoline Throughput Summary

Product Type	Amount Delivered	Amount Dispensed	Within Variance?
	+	+	Y N
	+	+	Y N
	+	+	Y N
	+	+	Y N
Monthly Totals	=	=	

Monthly Inspection, Condensed Record (perform by end of each month or 30 days apart)

Inspection Area (*see page 50 for complete checklist*)	Inspected?	Repaired?	Logged on Maintenance Record?	Inspected by? (initials)
Underground Storage Tanks and Gasoline Dispensing Equipment (includes Stage I vapor control system for facilities in Stage I areas)				
Release detection system	Y N	Y N	Y N	
Spill buckets	Y N	Y N	Y N	
Overfill alarm	Y N	Y N	Y N	
Impressed current system	Y N	Y N	Y N	
Fill and monitoring ports	Y N	Y N	Y N	
Spill and overfill response supplies	Y N	Y N	Y N	
Dispenser hoses, nozzles, and breakaways	Y N	Y N	Y N	
Dispensers and dispenser sumps	Y N	Y N	Y N	
Piping sumps	Y N	Y N	Y N	
Gasoline Dispensing Equipment at Facilities in Stage II Vapor Recovery Areas				
Vapor return line	Y N	Y N	Y N	
Nozzle bellows	Y N	Y N	Y N	
Nozzle faceplates/facecones	Y N	Y N	Y N	
Nozzles	Y N	Y N	Y N	
Vapor processing unit working properly	Y N	Y N	Y N	

System Maintenance and Repair Record

Inspection Date	Name of Inspector	Identify Problem/Defective Part	Repair Date	Replacement Part Manufacturer/Part Number

Weekly Inspection Record

Inspection Date	Inspected by (initials)

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January 2010

Weekly Inspection Checklist, page 49
Monthly Inspection Checklist, page 50

S	M	T	W	T	F	S
Need reminders of any deadlines this month? Mark your calendar!					1 Weekly Inspection ❑	2
3	4	5	6	7	8 Weekly Inspection ❑	9
10	11	12	13	14	15 Weekly Inspection ❑	16
17	18	19	20	21	22 Weekly Inspection ❑	23
24 31 Monthly Inventory Totals Recorded ❑ Monthly Inspection ❑	25	26	27	28	29 Weekly Inspection ❑	30

February 2010

• Attach monthly inventory worksheet(s) or printout(s) here •

Reminders—Permits, Insurance, Testing and Training

Are tank permits up to date?	Yes No
Is tank insurance due this month?	Yes No
Is any equipment testing due this month? Are most recent test results on site?	Yes No
If employee training is required at your facility, is all training up to date for current employees?	Yes No

Monthly Gasoline Throughput Summary

Product Type	Amount Delivered	Amount Dispensed	Within Variance?
	+	+	Y N
	+	+	Y N
	+	+	Y N
	+	+	Y N
Monthly Totals	=	=	

Monthly Inspection, Condensed Record (perform by end of each month or 30 days apart)

Inspection Area (*see page 50 for complete checklist*)	Inspected?	Repaired?	Logged on Maintenance Record?	Inspected by? (initials)
Underground Storage Tanks and Gasoline Dispensing Equipment (includes Stage I vapor control system for facilities in Stage I areas)				
Release detection system	Y N	Y N	Y N	
Spill buckets	Y N	Y N	Y N	
Overfill alarm	Y N	Y N	Y N	
Impressed current system	Y N	Y N	Y N	
Fill and monitoring ports	Y N	Y N	Y N	
Spill and overfill response supplies	Y N	Y N	Y N	
Dispenser hoses, nozzles, and breakaways	Y N	Y N	Y N	
Dispensers and dispenser sumps	Y N	Y N	Y N	
Piping sumps	Y N	Y N	Y N	
Gasoline Dispensing Equipment at Facilities in Stage II Vapor Recovery Areas				
Vapor return line	Y N	Y N	Y N	
Nozzle bellows	Y N	Y N	Y N	
Nozzle faceplates/facecones	Y N	Y N	Y N	
Nozzles	Y N	Y N	Y N	
Vapor processing unit working properly	Y N	Y N	Y N	

System Maintenance and Repair Record

Inspection Date	Name of Inspector	Identify Problem/Defective Part	Repair Date	Replacement Part Manufacturer/Part Number

Weekly Inspection Record

Inspection Date	Inspected by (initials)

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2010 Compliance Calendar for Gasoline Dispensing Facilities

February 2010

Weekly Inspection Checklist, page 49
Monthly Inspection Checklist, page 50

S	M	T	W	T	F	S
	1	2	3	4	5 Weekly Inspection ❑	6
7	8	9	10	11	12 Weekly Inspection ❑	13
14	15	16	17	18	19 Weekly Inspection ❑	20
21	22	23	24	25	26 Weekly Inspection ❑	27
28 Monthly Inventory Totals Recorded ❑ Monthly Inspection ❑	NR 420 exemption requests due to DNR by March 1. Need reminders of any deadlines this month? Mark your calendar!					

March 2010

• Attach monthly inventory worksheet(s) or printout(s) here •

Reminders—Permits, Insurance, Testing and Training

Are tank permits up to date?	Yes No
Is tank insurance due this month?	Yes No
Is any equipment testing due this month? Are most recent test results on site?	Yes No
If employee training is required at your facility, is all training up to date for current employees?	Yes No

Monthly Gasoline Throughput Summary

Product Type	Amount Delivered	Amount Dispensed	Within Variance?
	+	+	Y N
	+	+	Y N
	+	+	Y N
	+	+	Y N
Monthly Totals	=	=	

Monthly Inspection, Condensed Record (perform by end of each month or 30 days apart)

Inspection Area (*see page 50 for complete checklist*)	Inspected?	Repaired?	Logged on Maintenance Record?	Inspected by? (initials)
Underground Storage Tanks and Gasoline Dispensing Equipment (includes Stage I vapor control system for facilities in Stage I areas)				
Release detection system	Y N	Y N	Y N	
Spill buckets	Y N	Y N	Y N	
Overfill alarm	Y N	Y N	Y N	
Impressed current system	Y N	Y N	Y N	
Fill and monitoring ports	Y N	Y N	Y N	
Spill and overfill response supplies	Y N	Y N	Y N	
Dispenser hoses, nozzles, and breakaways	Y N	Y N	Y N	
Dispensers and dispenser sumps	Y N	Y N	Y N	
Piping sumps	Y N	Y N	Y N	
Gasoline Dispensing Equipment at Facilities in Stage II Vapor Recovery Areas				
Vapor return line	Y N	Y N	Y N	
Nozzle bellows	Y N	Y N	Y N	
Nozzle faceplates/facecones	Y N	Y N	Y N	
Nozzles	Y N	Y N	Y N	
Vapor processing unit working properly	Y N	Y N	Y N	

System Maintenance and Repair Record

Inspection Date	Name of Inspector	Identify Problem/Defective Part	Repair Date	Replacement Part Manufacturer/Part Number

Weekly Inspection Record

Inspection Date	Inspected by (initials)

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March 2010

Weekly Inspection Checklist, page 49
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S	M	T	W	T	F	S
	1 **NR 420 exemption requests due to DNR**	2	3	4	5 Weekly Inspection ❑	6
7	8	9	10	11	12 Weekly Inspection ❑	13
14	15	16	17	18	19 Weekly Inspection ❑	20
21	22	23	24	25	26 Weekly Inspection ❑	27
28	29	30	31 Monthly Inventory Totals Recorded ❑ Monthly Inspection ❑	Need reminders of any deadlines this month? Mark your calendar!		

April 2010

• Attach monthly inventory worksheet(s) or printout(s) here •

Reminders—Permits, Insurance, Testing and Training

Are tank permits up to date?	Yes No
Is tank insurance due this month?	Yes No
Is any equipment testing due this month? Are most recent test results on site?	Yes No
If employee training is required at your facility, is all training up to date for current employees?	Yes No

Monthly Gasoline Throughput Summary

Product Type	Amount Delivered	Amount Dispensed	Within Variance?
	+	+	Y N
	+	+	Y N
	+	+	Y N
	+	+	Y N
Monthly Totals	=	=	

Monthly Inspection, Condensed Record (perform by end of each month or 30 days apart)

Inspection Area (*see page 50 for complete checklist*)	Inspected?	Repaired?	Logged on Maintenance Record?	Inspected by? (initials)
Underground Storage Tanks and Gasoline Dispensing Equipment (includes Stage I vapor control system for facilities in Stage I areas)				
Release detection system	Y N	Y N	Y N	
Spill buckets	Y N	Y N	Y N	
Overfill alarm	Y N	Y N	Y N	
Impressed current system	Y N	Y N	Y N	
Fill and monitoring ports	Y N	Y N	Y N	
Spill and overfill response supplies	Y N	Y N	Y N	
Dispenser hoses, nozzles, and breakaways	Y N	Y N	Y N	
Dispensers and dispenser sumps	Y N	Y N	Y N	
Piping sumps	Y N	Y N	Y N	
Gasoline Dispensing Equipment at Facilities in Stage II Vapor Recovery Areas				
Vapor return line	Y N	Y N	Y N	
Nozzle bellows	Y N	Y N	Y N	
Nozzle faceplates/facecones	Y N	Y N	Y N	
Nozzles	Y N	Y N	Y N	
Vapor processing unit working properly	Y N	Y N	Y N	

System Maintenance and Repair Record

Inspection Date	Name of Inspector	Identify Problem/Defective Part	Repair Date	Replacement Part Manufacturer/Part Number

Weekly Inspection Record

Inspection Date	Inspected by (initials)

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2010 Compliance Calendar for Gasoline Dispensing Facilities

April 2010

Weekly Inspection Checklist, page 49
Monthly Inspection Checklist, page 50

S	M	T	W	T	F	S
Need reminders of any deadlines this month? Mark your calendar!				1	2 Weekly Inspection ❑	3
4	5	6	7	8	9 Weekly Inspection ❑	10
11	12	13	14	15	16 Weekly Inspection ❑	17
18	19	20 **WPMCA Annual Convention, Madison**	21	22	23 Weekly Inspection ❑	24
25	26	27	28	29	30 Monthly Inventory Totals Recorded ❑ Monthly Inspection ❑	

May 2010

• Attach monthly inventory worksheet(s) or printout(s) here •

Reminders—Permits, Insurance, Testing and Training

Are tank permits up to date?	Yes No
Is tank insurance due this month?	Yes No
Is any equipment testing due this month? Are most recent test results on site?	Yes No
If employee training is required at your facility, is all training up to date for current employees?	Yes No

Monthly Gasoline Throughput Summary

Product Type	Amount Delivered	Amount Dispensed	Within Variance?
	+	+	Y N
	+	+	Y N
	+	+	Y N
	+	+	Y N
Monthly Totals	=	=	

Monthly Inspection, Condensed Record (perform by end of each month or 30 days apart)

Inspection Area (*see page 50 for complete checklist*)	Inspected?	Repaired?	Logged on Maintenance Record?	Inspected by? (initials)
Underground Storage Tanks and Gasoline Dispensing Equipment (includes Stage I vapor control system for facilities in Stage I areas)				
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Spill buckets	Y N	Y N	Y N	
Overfill alarm	Y N	Y N	Y N	
Impressed current system	Y N	Y N	Y N	
Fill and monitoring ports	Y N	Y N	Y N	
Spill and overfill response supplies	Y N	Y N	Y N	
Dispenser hoses, nozzles, and breakaways	Y N	Y N	Y N	
Dispensers and dispenser sumps	Y N	Y N	Y N	
Piping sumps	Y N	Y N	Y N	
Gasoline Dispensing Equipment at Facilities in Stage II Vapor Recovery Areas				
Vapor return line	Y N	Y N	Y N	
Nozzle bellows	Y N	Y N	Y N	
Nozzle faceplates/facecones	Y N	Y N	Y N	
Nozzles	Y N	Y N	Y N	
Vapor processing unit working properly	Y N	Y N	Y N	

System Maintenance and Repair Record

Inspection Date	Name of Inspector	Identify Problem/Defective Part	Repair Date	Replacement Part Manufacturer/Part Number

Weekly Inspection Record

Inspection Date	Inspected by (initials)

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2010 Compliance Calendar for Gasoline Dispensing Facilities

May 2010

Weekly Inspection Checklist, page 49
Monthly Inspection Checklist, page 50

S	M	T	W	T	F	S
Need reminders of any deadlines this month? Mark your calendar!						1
2	3	4	5	6	7 Weekly Inspection ❑	8
9	10	11	12	13	14 Weekly Inspection ❑	15
16	17	18	19	20	21 Weekly Inspection ❑	22
23 30	24 31 Monthly Inventory Totals Recorded ❑ Monthly Inspection ❑	25	26	27	28 Weekly Inspection ❑	29

June 2010

• Attach monthly inventory worksheet(s) or printout(s) here •

Reminders—Permits, Insurance, Testing and Training

Are tank permits up to date?	Yes No
Is tank insurance due this month?	Yes No
Is any equipment testing due this month? Are most recent test results on site?	Yes No
If employee training is required at your facility, is all training up to date for current employees?	Yes No

Monthly Gasoline Throughput Summary

Product Type	Amount Delivered	Amount Dispensed	Within Variance?
	+	+	Y N
	+	+	Y N
	+	+	Y N
	+	+	Y N
Monthly Totals	=	=	

Monthly Inspection, Condensed Record (perform by end of each month or 30 days apart)

Inspection Area (*see page 50 for complete checklist*)	Inspected?	Repaired?	Logged on Maintenance Record?	Inspected by? (initials)
Underground Storage Tanks and Gasoline Dispensing Equipment (includes Stage I vapor control system for facilities in Stage I areas)				
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Spill buckets	Y N	Y N	Y N	
Overfill alarm	Y N	Y N	Y N	
Impressed current system	Y N	Y N	Y N	
Fill and monitoring ports	Y N	Y N	Y N	
Spill and overfill response supplies	Y N	Y N	Y N	
Dispenser hoses, nozzles, and breakaways	Y N	Y N	Y N	
Dispensers and dispenser sumps	Y N	Y N	Y N	
Piping sumps	Y N	Y N	Y N	
Gasoline Dispensing Equipment at Facilities in Stage II Vapor Recovery Areas				
Vapor return line	Y N	Y N	Y N	
Nozzle bellows	Y N	Y N	Y N	
Nozzle faceplates/facecones	Y N	Y N	Y N	
Nozzles	Y N	Y N	Y N	
Vapor processing unit working properly	Y N	Y N	Y N	

System Maintenance and Repair Record

Inspection Date	Name of Inspector	Identify Problem/Defective Part	Repair Date	Replacement Part Manufacturer/Part Number

Weekly Inspection Record

Inspection Date	Inspected by (initials)

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2010 Compliance Calendar for Gasoline Dispensing Facilities

June 2010

Weekly Inspection Checklist, page 49
Monthly Inspection Checklist, page 50

S	M	T	W	T	F	S
		1	2	3	4 Weekly Inspection ❑	5
6	7	8	9	10	11 Weekly Inspection ❑	12
13	14	15	16	17	18 Weekly Inspection ❑	19
20	21	22	23	24	25 Weekly Inspection ❑	26
27	28	29	30 Monthly Inventory Totals Recorded ❑ Monthly Inspection ❑	Need reminders of any deadlines this month? Mark your calendar!		

July 2010

• Attach monthly inventory worksheet(s) or printout(s) here •

Reminders—Permits, Insurance, Testing and Training

Are tank permits up to date?	Yes No
Is tank insurance due this month?	Yes No
Is any equipment testing due this month? Are most recent test results on site?	Yes No
If employee training is required at your facility, is all training up to date for current employees?	Yes No

Monthly Gasoline Throughput Summary

Product Type	Amount Delivered	Amount Dispensed	Within Variance?
	+	+	Y N
	+	+	Y N
	+	+	Y N
	+	+	Y N
Monthly Totals	=	=	

Monthly Inspection, Condensed Record (perform by end of each month or 30 days apart)

Inspection Area (*see page 50 for complete checklist*)	Inspected?	Repaired?	Logged on Maintenance Record?	Inspected by? (initials)
Underground Storage Tanks and Gasoline Dispensing Equipment (includes Stage I vapor control system for facilities in Stage I areas)				
Release detection system	Y N	Y N	Y N	
Spill buckets	Y N	Y N	Y N	
Overfill alarm	Y N	Y N	Y N	
Impressed current system	Y N	Y N	Y N	
Fill and monitoring ports	Y N	Y N	Y N	
Spill and overfill response supplies	Y N	Y N	Y N	
Dispenser hoses, nozzles, and breakaways	Y N	Y N	Y N	
Dispensers and dispenser sumps	Y N	Y N	Y N	
Piping sumps	Y N	Y N	Y N	
Gasoline Dispensing Equipment at Facilities in Stage II Vapor Recovery Areas				
Vapor return line	Y N	Y N	Y N	
Nozzle bellows	Y N	Y N	Y N	
Nozzle faceplates/facecones	Y N	Y N	Y N	
Nozzles	Y N	Y N	Y N	
Vapor processing unit working properly	Y N	Y N	Y N	

System Maintenance and Repair Record

Inspection Date	Name of Inspector	Identify Problem/Defective Part	Repair Date	Replacement Part Manufacturer/Part Number

Weekly Inspection Record

Inspection Date	Inspected by (initials)

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2010 Compliance Calendar for Gasoline Dispensing Facilities

July 2010

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Monthly Inspection Checklist, page 50

S	M	T	W	T	F	S
Need reminders of any deadlines this month? Mark your calendar!				1	2 Weekly Inspection ❑	3
4	5	6	7	8	9 Weekly Inspection ❑	10
11	12	13	14	15	16 Weekly Inspection ❑	17
18	19	20	21	22	23 Weekly Inspection ❑	24
25	26	27	28	29	30 Weekly Inspection ❑	31 Monthly Inventory Totals Recorded ❑ Monthly Inspection ❑

August 2010

• Attach monthly inventory worksheet(s) or printout(s) here •

Reminders—Permits, Insurance, Testing and Training

Are tank permits up to date?	Yes No
Is tank insurance due this month?	Yes No
Is any equipment testing due this month? Are most recent test results on site?	Yes No
If employee training is required at your facility, is all training up to date for current employees?	Yes No

Monthly Gasoline Throughput Summary

Product Type	Amount Delivered	Amount Dispensed	Within Variance?
	+	+	Y N
	+	+	Y N
	+	+	Y N
	+	+	Y N
Monthly Totals	=	=	

Monthly Inspection, Condensed Record (perform by end of each month or 30 days apart)

Inspection Area (*see page 50 for complete checklist*)	Inspected?	Repaired?	Logged on Maintenance Record?	Inspected by? (initials)
Underground Storage Tanks and Gasoline Dispensing Equipment (includes Stage I vapor control system for facilities in Stage I areas)				
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Spill buckets	Y N	Y N	Y N	
Overfill alarm	Y N	Y N	Y N	
Impressed current system	Y N	Y N	Y N	
Fill and monitoring ports	Y N	Y N	Y N	
Spill and overfill response supplies	Y N	Y N	Y N	
Dispenser hoses, nozzles, and breakaways	Y N	Y N	Y N	
Dispensers and dispenser sumps	Y N	Y N	Y N	
Piping sumps	Y N	Y N	Y N	
Gasoline Dispensing Equipment at Facilities in Stage II Vapor Recovery Areas				
Vapor return line	Y N	Y N	Y N	
Nozzle bellows	Y N	Y N	Y N	
Nozzle faceplates/facecones	Y N	Y N	Y N	
Nozzles	Y N	Y N	Y N	
Vapor processing unit working properly	Y N	Y N	Y N	

System Maintenance and Repair Record

Inspection Date	Name of Inspector	Identify Problem/Defective Part	Repair Date	Replacement Part Manufacturer/Part Number

Weekly Inspection Record

Inspection Date	Inspected by (initials)

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2010 Compliance Calendar for Gasoline Dispensing Facilities

August 2010

Weekly Inspection Checklist, page 49
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S	M	T	W	T	F	S
1	2	3	4	5	6 Weekly Inspection ❑	7
8	9	10	11	12	13 Weekly Inspection ❑	14
15	16	17	18	19	20 Weekly Inspection ❑	21
22	23	24	25	26	27 Weekly Inspection ❑	28
29	30	31 Monthly Inventory Totals Recorded ❑ Monthly Inspection ❑	Need reminders of any deadlines this month? Mark your calendar!			

September 2010

• Attach monthly inventory worksheet(s) or printout(s) here •

Reminders—Permits, Insurance, Testing and Training

Are tank permits up to date?	Yes No
Is tank insurance due this month?	Yes No
Is any equipment testing due this month? Are most recent test results on site?	Yes No
If employee training is required at your facility, is all training up to date for current employees?	Yes No

Monthly Gasoline Throughput Summary

Product Type	Amount Delivered	Amount Dispensed	Within Variance?
	+	+	Y N
	+	+	Y N
	+	+	Y N
	+	+	Y N
Monthly Totals	=	=	

Monthly Inspection, Condensed Record (perform by end of each month or 30 days apart)

Inspection Area (*see page 50 for complete checklist*)	Inspected?	Repaired?	Logged on Maintenance Record?	Inspected by? (initials)
Underground Storage Tanks and Gasoline Dispensing Equipment (includes Stage I vapor control system for facilities in Stage I areas)				
Release detection system	Y N	Y N	Y N	
Spill buckets	Y N	Y N	Y N	
Overfill alarm	Y N	Y N	Y N	
Impressed current system	Y N	Y N	Y N	
Fill and monitoring ports	Y N	Y N	Y N	
Spill and overfill response supplies	Y N	Y N	Y N	
Dispenser hoses, nozzles, and breakaways	Y N	Y N	Y N	
Dispensers and dispenser sumps	Y N	Y N	Y N	
Piping sumps	Y N	Y N	Y N	
Gasoline Dispensing Equipment at Facilities in Stage II Vapor Recovery Areas				
Vapor return line	Y N	Y N	Y N	
Nozzle bellows	Y N	Y N	Y N	
Nozzle faceplates/facecones	Y N	Y N	Y N	
Nozzles	Y N	Y N	Y N	
Vapor processing unit working properly	Y N	Y N	Y N	

System Maintenance and Repair Record

Inspection Date	Name of Inspector	Identify Problem/Defective Part	Repair Date	Replacement Part Manufacturer/Part Number

Weekly Inspection Record

Inspection Date	Inspected by (initials)

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2010 Compliance Calendar for Gasoline Dispensing Facilities

September 2010

Weekly Inspection Checklist, page 49
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S	M	T	W	T	F	S
Need reminders of any deadlines this month? Mark your calendar!			1	2	3 Weekly Inspection ❑	4
5	6	7	8	9	10 Weekly Inspection ❑	11
12	13	14	15	16	17 Weekly Inspection ❑	18
19	20	21	22	23	24 Weekly Inspection ❑	25
26	27	28	29	30 Monthly Inventory Totals Recorded ❑ Monthly Inspection ❑		

October 2010

• Attach monthly inventory worksheet(s) or printout(s) here •

Reminders—Permits, Insurance, Testing and Training

Are tank permits up to date?	Yes No
Is tank insurance due this month?	Yes No
Is any equipment testing due this month? Are most recent test results on site?	Yes No
If employee training is required at your facility, is all training up to date for current employees?	Yes No

Monthly Gasoline Throughput Summary

Product Type	Amount Delivered	Amount Dispensed	Within Variance?
	+	+	Y N
	+	+	Y N
	+	+	Y N
	+	+	Y N
Monthly Totals	=	=	

Monthly Inspection, Condensed Record (perform by end of each month or 30 days apart)

Inspection Area (*see page 50 for complete checklist*)	Inspected?	Repaired?	Logged on Maintenance Record?	Inspected by? (initials)
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Overfill alarm	Y N	Y N	Y N	
Impressed current system	Y N	Y N	Y N	
Fill and monitoring ports	Y N	Y N	Y N	
Spill and overfill response supplies	Y N	Y N	Y N	
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Dispensers and dispenser sumps	Y N	Y N	Y N	
Piping sumps	Y N	Y N	Y N	
Gasoline Dispensing Equipment at Facilities in Stage II Vapor Recovery Areas				
Vapor return line	Y N	Y N	Y N	
Nozzle bellows	Y N	Y N	Y N	
Nozzle faceplates/facecones	Y N	Y N	Y N	
Nozzles	Y N	Y N	Y N	
Vapor processing unit working properly	Y N	Y N	Y N	

System Maintenance and Repair Record

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Weekly Inspection Record

Inspection Date	Inspected by (initials)

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2010 Compliance Calendar for Gasoline Dispensing Facilities

October 2010

Weekly Inspection Checklist, page 49
Monthly Inspection Checklist, page 50

S	M	T	W	T	F	S
Need reminders of any deadlines this month? Mark your calendar!					1 Weekly Inspection ❑	2
3	4	5	6	7	8 Weekly Inspection ❑	9
10	11	12	13	14	15 Weekly Inspection ❑	16
17	18	19	20	21	22 Weekly Inspection ❑	23
24 31 Monthly Inventory Totals Recorded ❑ Monthly Inspection ❑	25	26	27	28	29 Weekly Inspection ❑	30

November 2010

• Attach monthly inventory worksheet(s) or printout(s) here •

Reminders—Permits, Insurance, Testing and Training

Are tank permits up to date?	Yes No
Is tank insurance due this month?	Yes No
Is any equipment testing due this month? Are most recent test results on site?	Yes No
If employee training is required at your facility, is all training up to date for current employees?	Yes No

Monthly Gasoline Throughput Summary

Product Type	Amount Delivered	Amount Dispensed	Within Variance?
	+	+	Y N
	+	+	Y N
	+	+	Y N
	+	+	Y N
Monthly Totals	=	=	

Monthly Inspection, Condensed Record (perform by end of each month or 30 days apart)

Inspection Area (*see page 50 for complete checklist*)	Inspected?	Repaired?	Logged on Maintenance Record?	Inspected by? (initials)
Underground Storage Tanks and Gasoline Dispensing Equipment (includes Stage I vapor control system for facilities in Stage I areas)				
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Vapor return line	Y N	Y N	Y N	
Nozzle bellows	Y N	Y N	Y N	
Nozzle faceplates/facecones	Y N	Y N	Y N	
Nozzles	Y N	Y N	Y N	
Vapor processing unit working properly	Y N	Y N	Y N	

System Maintenance and Repair Record

Inspection Date	Name of Inspector	Identify Problem/Defective Part	Repair Date	Replacement Part Manufacturer/Part Number

Weekly Inspection Record

Inspection Date	Inspected by (initials)

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2010 Compliance Calendar for Gasoline Dispensing Facilities

November 2010

Weekly Inspection Checklist, page 49
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S	M	T	W	T	F	S
	1	2	3	4	5 Weekly Inspection ❑	6
7	8	9	10	11	12 Weekly Inspection ❑	13
14	15	16	17	18	19 Weekly Inspection ❑	20
21	22	23	24	25	26 Weekly Inspection ❑	27
28	29	30 Monthly Inventory Totals Recorded ❑ Monthly Inspection ❑	Need reminders of any deadlines this month? Mark your calendar!			

December 2010

• Attach monthly inventory worksheet(s) or printout(s) here •

Reminders—Permits, Insurance, Testing and Training

Are tank permits up to date?	Yes No
Is tank insurance due this month?	Yes No
Is any equipment testing due this month? Are most recent test results on site?	Yes No
If employee training is required at your facility, is all training up to date for current employees?	Yes No

Monthly Gasoline Throughput Summary

Product Type	Amount Delivered	Amount Dispensed	Within Variance?
	+	+	Y N
	+	+	Y N
	+	+	Y N
	+	+	Y N
Monthly Totals	=	=	

Monthly Inspection, Condensed Record (perform by end of each month or 30 days apart)

Inspection Area (*see page 50 for complete checklist*)	Inspected?	Repaired?	Logged on Maintenance Record?	Inspected by? (initials)
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Overfill alarm	Y N	Y N	Y N	
Impressed current system	Y N	Y N	Y N	
Fill and monitoring ports	Y N	Y N	Y N	
Spill and overfill response supplies	Y N	Y N	Y N	
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Dispensers and dispenser sumps	Y N	Y N	Y N	
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Gasoline Dispensing Equipment at Facilities in Stage II Vapor Recovery Areas				
Vapor return line	Y N	Y N	Y N	
Nozzle bellows	Y N	Y N	Y N	
Nozzle faceplates/facecones	Y N	Y N	Y N	
Nozzles	Y N	Y N	Y N	
Vapor processing unit working properly	Y N	Y N	Y N	

System Maintenance and Repair Record

Inspection Date	Name of Inspector	Identify Problem/Defective Part	Repair Date	Replacement Part Manufacturer/Part Number

Weekly Inspection Record

Inspection Date	Inspected by (initials)

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2010 Compliance Calendar for Gasoline Dispensing Facilities

December 2010

Weekly Inspection Checklist, page 49
Monthly Inspection Checklist, page 50

S	M	T	W	T	F	S
Need reminders of any deadlines this month? Mark your calendar!			1	2	3 Weekly Inspection ❑	4
5	6	7	8	9	10 Weekly Inspection ❑	11
12	13	14	15	16	17 Weekly Inspection ❑	18
19	20	21	22	23	24 Weekly Inspection ❑	25
26	27	28	29	30	31 Monthly Inventory Totals Recorded ❑ Monthly Inspection ❑	

January 2011

• Attach monthly inventory worksheet(s) or printout(s) here •

Reminders—Permits, Insurance, Testing and Training

Are tank permits up to date?	Yes No
Is tank insurance due this month?	Yes No
Is any equipment testing due this month? Are most recent test results on site?	Yes No
If employee training is required at your facility, is all training up to date for current employees?	Yes No

Monthly Gasoline Throughput Summary

Product Type	Amount Delivered	Amount Dispensed	Within Variance?
	+	+	Y N
	+	+	Y N
	+	+	Y N
	+	+	Y N
Monthly Totals	=	=	

Monthly Inspection, Condensed Record (perform by end of each month or 30 days apart)

Inspection Area (*see page 50 for complete checklist*)	Inspected?	Repaired?	Logged on Maintenance Record?	Inspected by? (initials)
Underground Storage Tanks and Gasoline Dispensing Equipment (includes Stage I vapor control system for facilities in Stage I areas)				
Release detection system	Y N	Y N	Y N	
Spill buckets	Y N	Y N	Y N	
Overfill alarm	Y N	Y N	Y N	
Impressed current system	Y N	Y N	Y N	
Fill and monitoring ports	Y N	Y N	Y N	
Spill and overfill response supplies	Y N	Y N	Y N	
Dispenser hoses, nozzles, and breakaways	Y N	Y N	Y N	
Dispensers and dispenser sumps	Y N	Y N	Y N	
Piping sumps	Y N	Y N	Y N	
Gasoline Dispensing Equipment at Facilities in Stage II Vapor Recovery Areas				
Vapor return line	Y N	Y N	Y N	
Nozzle bellows	Y N	Y N	Y N	
Nozzle faceplates/facecones	Y N	Y N	Y N	
Nozzles	Y N	Y N	Y N	
Vapor processing unit working properly	Y N	Y N	Y N	

System Maintenance and Repair Record

Inspection Date	Name of Inspector	Identify Problem/Defective Part	Repair Date	Replacement Part Manufacturer/Part Number

Weekly Inspection Record

Inspection Date	Inspected by (initials)

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2010 Compliance Calendar for Gasoline Dispensing Facilities

January 2011

Weekly Inspection Checklist, page 49
Monthly Inspection Checklist, page 50

S	M	T	W	T	F	S
Need reminders of any deadlines this month? Mark your calendar!						1
2	3	4	5	6	7 Weekly Inspection ❑	8
9	10	11	12	13	14 Weekly Inspection ❑	15
16	17	18	19	20	21 Weekly Inspection ❑	22
23 30	24 31 Monthly Inventory Totals Recorded ❑ Monthly Inspection ❑	25	26	27	28 Weekly Inspection ❑	29

Summary of the Regulations Affecting Gasoline Dispensing Facilities

These sections of the calendar provide a general overview of the following three rules that apply to gas stations and gasoline dispensing facilities:

- US EPA's ***National Emission Standards for Hazardous Air Pollutants*** (NESHAP) for gasoline dispensing facilities (40 CFR part 63, subpart CCCCCC). This rule regulates vapor control during filling of gasoline storage tanks.

- Wisconsin Department of Natural Resources regulations regarding ***Control of Organic Compound Emissions from Petroleum and Gasoline Sources*** (Ch. NR 420, Wis. Adm. Code). This rule regulates vapor control in some Wisconsin counties, both during filling of gasoline storage tanks and refueling of motor vehicles.

- Wisconsin Department of Commerce regulations for ***Flammable, Combustible and Hazardous Liquids*** (Ch. Comm 10, Wis. Adm. Code). This rule regulates gasoline storage tanks and associated piping.

This overview should help you understand how your facility is affected by the regulations. It is not a substitute for reading and understanding the rules, though. Refer to the regulations for additional information and clarification.

Both the national emission standards and Wisconsin's state regulations for controlling emissions from gas stations refer to using "vapor control" or "vapor recovery" to reduce emissions of pollutants. Before we launch into the specific requirements of these regulations, a few words about vapor recovery.

What is a vapor recovery system, and how does it capture gasoline vapors?

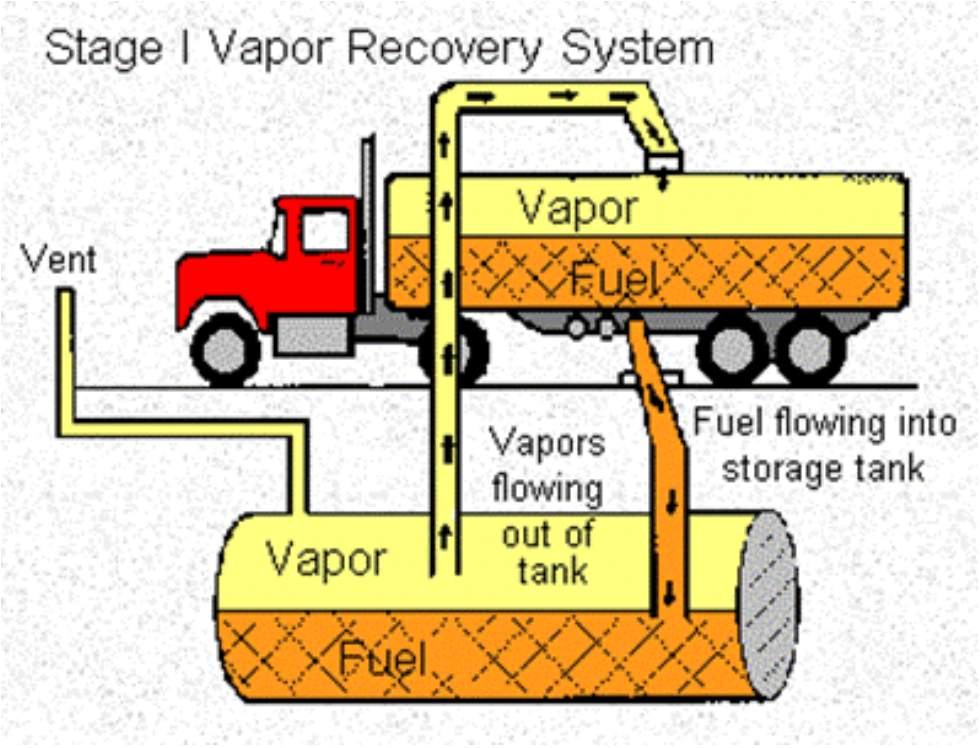
Certified vapor recovery systems include hoses, nozzles, processors, and other equipment that create a closed system which returns gasoline vapor back to the underground storage tank and then back to the truck that delivers the gasoline to your station. The system and equipment are designed to capture vapor before it is released to the air. There are two aspects of gasoline vapor recovery, sometimes called Stage I and Stage II.

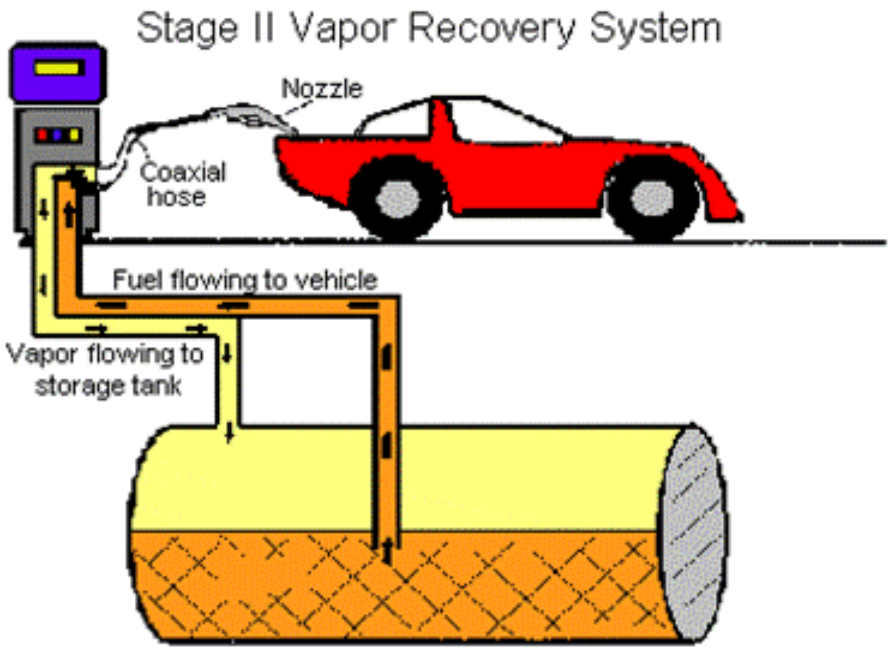
Stage I vapor recovery—underground storage tanks and loading equipment

Stage I vapor recovery is a control method to capture gasoline vapors that are released when gasoline is delivered to a storage tank. Instead of being released to the air, the vapors are captured and returned to the tank truck as the storage tank is being filled with fuel. From there, they can be transported back to the terminal vapor processor for recovery or destruction.

In Wisconsin's state regulation, Stage I vapor recovery requirements apply to gasoline dispensing facilities located in these twenty counties:

- Brown
- Calumet
- Dane
- Dodge
- Door
- Fond du Lac
- Jefferson
- Kenosha
- Kewaunee
- Manitowoc
- Milwaukee
- Outagamie
- Ozaukee
- Racine
- Rock
- Sheboygan
- Walworth
- Washington
- Waukesha
- Winnebago





With the new federal rule that took effect in January 2008, some facilities in other parts of Wisconsin will be required to have vapor control systems on their storage tanks also. In the federal NESHAP, vapor controls similar to Wisconsin's Stage I vapor recovery requirements—called vapor balancing in the rule—also apply to all facilities with gasoline throughput of 100,000 gallons per month or more, regardless of location (see the section below for more details).

Stage II vapor recovery—gasoline dispensing equipment

Stage II vapor recovery captures gasoline vapor that would otherwise escape into the air when motorists refuel their vehicles. Using special dispensing nozzles fitted with vapor return lines, vapors are returned through the pump hose to the gasoline storage tank instead of being released into the air.

In Wisconsin's state regulation, Stage II vapor recovery requirements apply to gasoline dispensing facilities located in these nine counties:

- Kenosha
- Kewaunee
- Manitowoc
- Milwaukee
- Ozaukee
- Racine
- Sheboygan
- Washington
- Waukesha

The following sections contain information about each of the three rules: the federal NESHAP, DNR's Stage I/Stage II requirements, and Commerce's tank regulations.

National Emission Standards for Hazardous Air Pollutants from Gasoline Dispensing Facilities (40 CFR part 63, subpart CCCCCC)

This national standard from EPA regulates vapor control during the filling of gasoline storage tanks at gas stations and other gasoline dispensing facilities. With this rule, EPA has established national emission limitations and management practices for hazardous air pollutants (HAPs) emitted when loading gasoline into storage tanks at these facilities.

EPA estimates that implementing this rule will reduce emissions of volatile organic compounds (VOCs) by 100,000 tons per year, and emissions of hazardous air pollutants will be reduced by 5,000 tons per year. This includes a reduction of 175 tons of benzene, one of the more toxic compounds in gasoline vapor.

EPA published the NESHAP for gasoline dispensing facilities on January 10, 2008. More recently (in December 2009), EPA proposed numerous amendments and clarifications to the rule, and information about the proposed changes is included in this year's calendar. Since these rule changes have not been finalized yet, we have used the notation [*proposed 12-15-2009*] to identify them.

Who is affected by this rule?

The federal EPA regulation affects "area sources," all gasoline dispensing facilities that emit less than 10 tons per year of a single toxic air pollutant or less than 25 tons per year of any combination of toxic air pollutants. Most gas stations will fall into this group.

EPA intends for this rule to apply to all stationary facilities that dispense gasoline into the fuel tanks of motor vehicles, boats, lawn and landscaping equipment, generators, and other gasoline-fueled engines. A clarified definition of a gasoline dispensing facility is among the proposed changes to the rule [*proposed 12-15-2009*]. See the Definitions section at the end of this calendar for more information.

When are the deadlines for complying with the rule?

The deadlines for complying with the national emission standard depend on the type of facility you operate.

New or reconstructed facilities—

- Comply by January 10, 2008; or
- comply upon startup if you start your business after January 10, 2008.
- For facilities with gasoline throughput of 100,000 gallons per month or more,
  - ❑ comply by September 23, 2008 if you started up your business from November 9, 2006 to September 23, 2008; or
  - ❑ comply upon startup if you started your business after September 23, 2008.

"New" facilities are those that commenced construction after November 9, 2006. For more information about what constitutes a "reconstructed" facility, see the Definitions on page 53.

Existing facilities—

- Comply by January 10, 2011.
- Existing facilities that become subject to different controls due to an increase in the amounts of gasoline throughput must comply by 3 years after becoming subject to the control requirements.

Since this is a new regulation for many gas stations in Wisconsin, facility owners and operators should determine the correct deadline for their operations and plan ahead to meet all requirements on time.

Who should I contact for more information about this rule?

Constantinos Loukeris at EPA's Region 5 office in Chicago is the contact for gasoline facilities in Wisconsin. He can be reached at 312-353-6198.

What are the controls and management practices required by this rule?

The type of vapor control required by the national standard depends on the monthly amount of gasoline throughput at your facility.

- ***All*** facilities must perform specified ***good management practices*** that will minimize evaporation of gasoline.

- Facilities with an average monthly gasoline throughput of ***10,000 gallons or more*** must perform the good management practices plus employ ***submerged filling*** of their gasoline storage tanks. Submerged filling means either bottom filling the storage tank or using a fill pipe (drop tube) to load the storage tank:
  (1) no more than 12" from the bottom [for fill pipes installed after November 9, 2006]; or
  (2) no more than 6" from the bottom [for fill pipes installed before November 9, 2006].

- Facilities with an average monthly gasoline throughput of ***100,000 gallons or more*** must perform the good management practices, employ submerged filling, and also must use ***vapor balancing***. Vapor balancing (which is similar to Stage I vapor recovery) uses a closed system of pipes and hoses to transfer gasoline vapor that is displaced from the storage tank during filling back to the cargo tank being unloaded.

EPA has proposed that, if a facility goes over a throughput threshold, it must comply with the requirements for that level even if throughput later drops below the threshold [*proposed 12-15-2009*]. EPA has also proposed to clarify the definition of "throughput" and how to calculate it [*proposed 12-15-2009*]. See the Definitions section of this calendar for more information.

The table below summarizes the specific requirements for gas stations under this rule.

What compliance testing and monitoring is required by this rule?

The compliance testing requirements of this rule depend on the amount of gasoline dispensed at your facility. The testing requirements affect facilities with throughput of 100,000 gallons of gasoline per month or more—that is, the facilities required to use vapor control systems.

To meet the compliance testing requirement, facilities must:

- Demonstrate compliance with the leak rate and cracking pressure requirements specified in the rule for pressure-vacuum vent valves on storage tanks.
- Demonstrate compliance with the static pressure test on storage tanks.

Compliance testing is required at the time of installation ("initial compliance") and every 3 years after that. For existing facilities with existing vapor control systems, EPA has proposed the following schedule for compliance testing:

- vapor balance system installed on or before December 15, 2009—initial compliance test within 180 days of the compliance date (January 10, 2011); or
- vapor balance system installed after December 15, 2009—initial test upon installation of the system [*proposed 12-15-2009*].

The regulation also specifies the approved testing methods that can be used to meet this requirement.

What are the record keeping and notification requirements of this rule?

As with the vapor control requirements, record keeping and notification required by this rule depend on the amount of gasoline dispensed at your facility:

- ***All facilities*** must keep track their gasoline throughput—the amounts of gasoline delivered and dispensed—each month. Facilities that dispense less than 10,000 gallons of gasoline per month must be able to provide

documentation demonstrating their gasoline throughput within 24 hours of a request from EPA or DNR.

- ***Facilities that dispense 10,000 gallons of gasoline or more per month*** are required to submit an Initial Notification, indicating that you are subject to the requirements of this rule. That Initial Notification was due either by May 9, 2008, or at the time your facility becomes subject to the 10,000 gallon threshold.

- ***Facilities that dispense 10,000 gallons of gasoline or more per month*** are also required to submit a Notification of Compliance Status, certifying whether your facility has complied with the requirements of the rule. This notification is due by the compliance date that applies to your facility (see "When are the deadlines..." above).

Sample notification forms are available on the SBCAAP's Air Toxics web site, *http://commerce.wi.gov/BD/BD-CA-Air_Toxics.html* (scroll down to the section for gasoline dispensing, under the entry for 1/10/2008). All records required by this rule must be kept at the facility for 5 years. This includes your records for monthly gasoline throughput. Use this calendar and save it to help meet your record keeping obligations!

Summary of EPA's Emission Standard for HAPs at Gasoline Dispensing Facilities (40 CFR part 63, subpart CCCCCC)

If throughput is…	Required actions	Required record keeping and/or reporting
less than 10,000 gallons/month	Use the following good management practices to handle gasoline in a manner that avoids vapor releases to the atmosphere for extended periods of time: 1. Minimize spills. 2. Clean up spills expeditiously. 3. Cover gasoline containers and storage tank fill pipes with gasketed seals. 4. Minimize gasoline sent to open waste collection systems.	Must be able to demonstrate that gasoline throughput is less than 10,000 gallons/month within 24 hours of request by EPA or DNR.
10,000 gallons/month or more, if tanks are less than 250 gallons capacity	Only requirements 1-4 above apply.	Requirements above apply.
10,000 gallons/month or more, if tanks are at least 250 gallons capacity	Requirements 1-4 above apply, plus: 5. Load gasoline into storage tanks using submerged filling. Discharge must be no more than the following distances from bottom of tank: a) 12 inches for pipes installed on or before November 9, 2006; b) 6 inches for pipes installed after November 9, 2006.	1. Submit ***Initial Notification*** that you are subject to rule requirements ***by May 9, 2008*** for existing gasoline dispensing facilities; or within 15 days for new or reconstructed facilities. 2. Submit ***Notification of Compliance Status by applicable deadline***.
100,000 gallons/month or more, if tanks are: • less than 250 gallons capacity, if constructed after Jan 10, 2008; • less than 2,000 gallons capacity, if constructed before Jan 10, 2008; • equipped with floating roofs	Requirements 1-5 apply.	Requirements above apply.

Summary of EPA's Emission Standard for HAPs at Gasoline Dispensing Facilities (continued)		
If throughput is…	**Required actions**	**Required record keeping and/or reporting**
100,000 gallons/month or more	Requirements 1-5 above apply. In addition, new and reconstructed gasoline dispensing facilities must install a vapor balance system upon startup. (Vapor balance systems collect and route the vapors displaced from loading the storage tank back into the tank truck.) The vapor balance system must meet **one** of the following requirements (#6-8): 6. Operate a vapor balance system prior to January 10, 2008 that meets an enforceable State, local, or tribal rule or permit that requires, either: a) achieving an emission reduction of at least 90%, or b) operates using management practices at least as stringent as those specified in #7 below.	Requirements 1-2 above apply, plus: 3. Keep records, report, and test as specified in enforceable conditions. Make records available to EPA and DNR upon request.
	7. Operate a vapor balance system on storage tanks that meets the following management practices: a) equip connections and lines with closures that seal when disconnected b) vapor tight line from storage tank to cargo tank c) cargo tank pressure remains below specified settings d) adaptors and connectors designed to prevent over tight/loose fittings during delivery e) if gauge well used, gauge well provided with submerged drop tube extending specified distance from tank bottom (see item #5 above) f) use vapor tight caps for liquid fill connections g) install pressure/vacuum vent valves on tank vent pipes to meet specified requirements, and test initially and every 3 years h) vapor balance system must meet specified static pressure; performance test initially and every 3 years i) for new or reconstructed facilities, or new tanks installed at existing facilities, use dual-point (no coaxial) vapor balance systems	Requirements 1-2 above apply, plus: 4. Keep records of initial and every three year pressure tests. Tests required at time of installation and every 3 years thereafter, to determine the leak rate and cracking pressure of pressure-vacuum vent valves installed on gasoline storage tanks. Some owners or operators, depending on what vapor balance option is met, must also conduct a static pressure test on gasoline storage tanks. ***Notification of performance testing due 60 days before test, and test results due 180 days after testing***.
	8. Operate a vapor balance system demonstrated to achieve a reduction of 95% or better.	Requirements 1, 2 and 4 above apply, plus: 5. Conduct initial performance test to demonstrate that vapor balance system achieves 95% reduction. ***Test notification due 60 days before test, and test results due 180 days after testing***.

Wisconsin's Regulation for Control of Organic Compound Emissions from Petroleum and Gasoline Sources (Ch. NR 420, Wis. Adm. Code)

The federal Clean Air Act requires states to minimize and control air pollution. Measures to control air emissions are specifically required in areas not meeting federal ambient air quality standards, and Wisconsin contains some of these areas. The Wisconsin Department of Natural Resources administers Ch. NR 420, Wis. Adm. Code, to address controlling vapors that can be released during filling of gasoline storage tanks and motor vehicle refueling. These vapors, volatile organic compounds, contribute to ground-level ozone. Chapter NR 420 applies to gasoline dispensing facilities, delivery vessels used to bring gasoline to these facilities, and operations involved in fueling consumers' vehicles.

NR 420 regulates the control of gasoline vapors through Stage I and Stage II vapor recovery requirements. If your gasoline dispensing facility is located in an affected county and meets other eligibility criteria in the rule, you must comply with the applicable Stage I/Stage II vapor recovery requirements. The section below and the table on the next page summarize which facilities are affected by this rule.

Stage I vapor recovery is a control method to capture gasoline vapors that are released when gasoline is delivered to a storage tank. The vapors are returned to the tank truck as the storage tank is being filled with fuel, rather than being released to the ambient air.

Stage II vapor recovery is the control method that captures gasoline vapors when a vehicle is being fueled at the pump. The vapors are returned through the pump hose to the petroleum storage tank instead of being released into the air.

Who is affected by this rule?

Stage I vapor recovery requirements apply to gasoline dispensing facilities that are located in these twenty Wisconsin counties:

- Brown
- Calumet
- Dane
- Dodge
- Door
- Fond du Lac
- Jefferson
- Kenosha
- Kewaunee
- Manitowoc
- Milwaukee
- Outagamie
- Ozaukee
- Racine
- Rock
- Sheboygan
- Walworth
- Washington
- Waukesha
- Winnebago

The Stage I vapor control requirements in NR 420 apply to facilities in the above counties that have storage tanks with a capacity of:

- more than 2,000 gallons if installed on or before August 1, 1979, or
- more than 575 gallons if installed after August 1, 1979.

Stage II vapor recovery requirements apply to gasoline dispensing facilities that are located in these nine Wisconsin counties:

- Kenosha
- Kewaunee
- Manitowoc
- Milwaukee
- Ozaukee
- Racine
- Sheboygan
- Washington
- Waukesha

When do I have to comply with the rule?

Wisconsin's rule for vapor control at gas stations in the twenty counties listed above has been in effect for some time. All affected facilities should be complying with this rule already.

What are the rule's requirements for filling gasoline storage tanks?

The Stage I vapor recovery requirements are contained in section NR 420.04(3) of the rule. For gasoline facilities in the twenty counties that are subject to the Stage I vapor recovery requirements, gasoline must be transferred from delivery vessels into storage tanks using:

- a submerged fill pipe on the storage tank, and
- a vapor control system.

Vapor Control System—The vapor control system should include one or more of:

- a vapor balance system with vapor-tight vapor return line from storage tank to delivery vessel
- a refrigeration-condensation system capable of recovering at least 90% by weight of organic compounds in the displaced vapor, or equally effective alternative control method approved by DNR

Vapor Control Equipment Installation and Maintenance—All control equipment must be installed to meet the rule's requirements. Worn out or malfunctioning equipment must be repaired, replaced or modified. Keep records of all repairs.

Operation and Maintenance Instructions—The facility owner must provide written instructions to the facility operator, describing necessary operating and maintenance procedures and procedures for prompt notification of the owner in case of any malfunction of the control system.

Vapor Control System Operation and Maintenance Requirements—Facility operators should:

- maintain and operate the vapor control system according to the specifications and procedures specified by the owner
- promptly notify the owner of any scheduled maintenance or malfunction

requiring repair or replacement
- keep a copy of the operating instructions on site
- maintain written records of maintenance, malfunction and repair
- maintain gauges, meters or other testing devices in working order

What are the rule's requirements for motor vehicle fueling?

The Stage II vapor recovery requirements are contained in section NR 420.045 of the rule. For gas stations in the nine counties listed that are subject to the Stage II vapor recovery requirements, the equipment that dispenses gasoline from storage tanks to motor vehicle fuel tanks must be equipped with a vapor recovery system.

Throughput Exemption—A gasoline dispensing facility is exempt from these Stage II vapor recovery requirements if the facility never dispenses more than 10,000 gallons of gasoline per month, on average, for any 24 month period beginning with calendar years 1991 and 1992 (any period of time when the facility was non-operational must be excluded from the calculation). Annual reporting is required for gas stations claiming this exemption, and the reporting requirements are detailed in the rule.

Vapor Recovery System Requirements—The equipment for filling motor vehicle tanks is required to have a vapor recovery system that meets these requirements:
- the type of vapor recovery system must be certified by the California Air Resources Board to achieve 95% vapor recovery
- the system must use only coaxial hoses
- the system does not use remote check valves
- the system has been tested according to the rule's compliance testing requirements and demonstrated to function properly

System Operation Requirements—The vapor recovery system must be maintained so that it is free of defects. The regulation gives details of specific defects, and some examples include:
- required components that are missing or disconnected
- hoses or return lines that are crimped, flattened or otherwise blocked
- damaged nozzle boot
- damaged faceplate
- nozzle shutoffs that are malfunctioning

Weekly Inspections for Equipment Maintenance—Weekly equipment inspections are required to ensure that the equipment is working properly. The inspections must include these areas:
- a visual inspection to ensure that flow shutoffs are working properly
- inspection of all boots, hoses, facecones and faceplates for tears or rips
- a visual inspection of all dispensing equipment for any gasoline leaks
- inspection of all delivery nozzles for tightness and bends which may impede vapor recovery

This calendar contains a Weekly Inspection Checklist on page 49 to help you meet this requirement. You can use the Weekly Inspection Record on the monthly calendar pages to keep a log of your inspections.

Employee Training—Facilities that are subject to Stage II vapor recovery regulations must perform employee training. The facility owner-operator is required to ensure that at least one employee of the facility receives DNR approved training. The training must be at least 6 hours and cover these subjects:
- purpose of the vapor recovery system
- operation of the vapor recovery equipment installed at the facility
- equipment maintenance schedules and procedures
- warranties applicable to the equipment
- contact information for equipment manufacturers

If the only trained employee terminates employment with the facility, a new employee must receive training within 45 days. If the type of vapor recovery system at the facility changes, an employee must receive training before startup of the new system.

Summary of Wisconsin's Regulation for Control of Emissions at Gasoline Dispensing Facilities (Ch. NR 420, Wis. Adm. Code)

If these conditions apply…	And facility is located in...	Required vapor control...
storage tanks are more than 575 gallons capacity if installed after August 1, 1979, or more than 2,000 gallons capacity if installed on or before August 1, 1979	Brown, Calumet, Dane, Dodge, Door, Fond du Lac, Jefferson, Kenosha, Kewaunee, Manitowoc, Milwaukee, Outagamie, Ozaukee, Racine, Rock, Sheboygan, Walworth, Washington, Waukesha and Winnebago counties	Stage I vapor recovery
dispense 10,000 gallons per month or more, on average	Kenosha, Kewaunee, Manitowoc, Milwaukee, Ozaukee, Racine, Sheboygan, Washington, and Waukesha counties	Stage II vapor recovery

Wisconsin Petroleum Marketers provides DNR approved employee training. See the Sources of Information list on page 54 of this calendar for contact information.

This calendar provides space for you to keep records of all the employee training at your facility (see next page). Use the Employee Training Log to help meet your requirements for keeping records of the training at your facility.

Posting Signs on Gasoline Dispensers—Post clear instructions on your gasoline dispensers showing:

- how to operate the vapor recovery system
- a warning not to top off fuel tanks
- the telephone number for DNR, 800-453-0645, in case of questions about the vapor recovery equipment

Compliance Testing—The vapor recovery system must be tested regularly to demonstrate compliance with the requirements of this rule.

Initial compliance testing should include:

- a leak test on the entire vapor recovery system
- a liquid blockage and dynamic backpressure test on each vapor recovery nozzle

You must also conduct an ***annual compliance test*** on the vapor recovery system. Perform the annual test within 60 days of the anniversary of the initial compliance test. The annual compliance test should include:

- a leak test on the entire vapor recovery system
- a dynamic backpressure test on each vapor recovery nozzle
- at 5 year intervals after the initial compliance testing, the annual compliance test should include all the tests required for the initial compliance test

If your facility has a ***vapor recovery assist system*** that uses a pump, blower, or other vacuum device to collect gasoline vapors, your compliance testing requirements are as follows. ***Initial compliance testing*** should include:

- a leak test on the vapor recovery system
- a liquid blockage test on each vapor recovery nozzle

Conduct an ***annual compliance test*** on the vapor recovery system, performed within 60 days of the anniversary of the initial compliance test. The annual compliance test should include:

- a leak test on the vapor recovery system
- at 5 year intervals after the initial compliance testing, the annual compliance test should include all the tests required for the initial compliance test

The procedures for compliance testing are detailed in DNR's Reporting, Recordkeeping, Testing, Inspection and Determination of Compliance Requirements (ch. NR 439). Testing methods to be used by gasoline dispensing facilities are listed in section NR 439.06(3)(i).

Notify the DNR in writing at least 20 business days in advance of any compliance testing at your facility. Section NR 439.07 contains details about the facility information and test plan that should be included in your notification.

Storage Tank Vent Pipes—Facilities in the Stage II vapor recovery counties with a total storage tank capacity of 2,000 gallons or more are also required to have vapor controls on storage tank vent pipes. The rule requires:

- installing a pressure vacuum valve on the gasoline storage tank vent pipe; and
- the pressure vacuum valve must be certified by the California Air Resources Board (CARB) and maintained in good working order.

What are the record keeping requirements in NR 420?

Gasoline dispensing facilities subject to the NR 420 vapor recovery requirements also have record keeping requirements. Records must be kept at the facility for a minimum of 3 years, though you should keep them for 5 years to be sure of complying with the more stringent federal regulation. The main record keeping requirements are in these areas:

- all permits or approvals that are necessary for operating the facility or the vapor recovery system
- the amount of gasoline dispensed at the facility on a monthly basis
- an inspection and maintenance log that includes the name of the person conducting the inspection, the inspection date, the identify of any defective part(s), the repair date, and manufacturer's part number
- a permanent record of employee training that includes the name of the employee(s) who received training, dates of the training, and a list of the subject areas in which the employee received training.

This calendar provides space to help you keep track of your gasoline throughput, equipment inspections, repairs and maintenance, and employee training. Use this calendar to help meet your record keeping obligations!

What other regulations apply? What if my facility is located outside the designated counties?

Gasoline dispensing facilities may also fall under requirements of Wisconsin's Control of Hazardous Pollutants rule (ch. NR 445, Wis. Adm. Code). Certain facilities may need to use additional vapor controls on their motor vehicle fueling equipment (that is, the "Stage II" system) even if they are located outside the designated vapor recovery counties. Requirements of NR 445 apply to:

- facilities that already have Stage I vapor recovery and pump more than 2 million gallons of gasoline per year; and
- facilities outside the Stage I counties that dispense more than 1.25 million

gallons of gasoline per year.

If your facility is affected, these vapor controls are required to control emissions of additional hazardous air pollutants, specifically benzene. Vapor controls for these gas stations must meet Lowest Achievable Emission Rate (LAER) requirements:

- Onboard Refueling Vapor Recovery (ORVR) compatible vapor recovery system that is certified by the Texas Commission on Environmental Quality (TCEQ), or
- ORVR or Enhanced Vapor Recovery system certified by the California Air Resources Board (CARB).
- When available, nozzles shall be used that are designed to be dripless and/or meet the 100 milliliter (ml) liquid retention standard, and which work at 100% efficiency with these ORVR vapor recovery systems.
- Any nozzle certified by CARB or TCEQ as dripless for use with one of the ORVR systems must be installed within 6 months of such certification.

Equipment improves all the time. To confirm that these criteria are still current, or for information on the current application of LAER technology, contact DNR's Stage II expert, Randy Reading, at randy.reading@wisconsin.gov or 414-263-8572. You may also request a letter from DNR confirming that your installation will meet the current requirements of the rule (NR 445).

Employee Training at Facilities in Stage II Vapor Recovery Areas

Does my facility have to do employee training?

Employee training is required for facilities in ***Kenosha, Kewaunee, Manitowoc, Milwaukee, Ozaukee, Racine, Sheboygan, Washington and Waukesha counties*** (the Stage II vapor recovery area in Wisconsin).

Some facilities may be exempt from the training requirement. You are exempt if:

- the facility never dispenses more than 10,000 gallons of gasoline per month, on average, for any 24 month period beginning with calendar years 1991 and 1992 (excluding any period of time when the facility was non–operational), or
- the facility never dispenses more than 50,000 gallons of gasoline per month, on average (calculated as above) and you qualify as an independent small business marketer. (The specific requirements for independent small business marketers are listed in section NR 420.045 of the rule.)

What employee training is required?

If employee training is required at your facility, at least one employee of the facility must receive DNR approved training that includes at least 6 hours of instruction. DNR approved training is available from the Wisconsin Petroleum Marketers and Convenience Store Association, www.wpmca.org or 608-256-7555.

When is the training required?

- Conduct the initial training within 45 days of the facility's compliance date.
- Train any new employee(s) within 45 days of the departure of the trained employee.
- If the facility changes its vapor recovery system, new employee training must be completed before startup of the new system.

What training records do I need to keep?

Keep a permanent record of your employee training. The records must include a document signed by the employee that contains all the following information:

- name of employee who received training
- dates of training
- list of areas in which employee received training
- amount of time (hours) employee spent receiving training

You can use the log below to keep a summary of all the employee training you have done at your facility during the year.

Employee Training Log			
Name of employee	**Dates of training**	**Areas/subjects of training**	**Amount of training**

Wisconsin's Flammable, Combustible and Hazardous Liquids Rule (Ch. Comm 10, Wis. Adm. Code)

The Wisconsin Department of Commerce's Environmental Regulatory Services Division regulates the storage of flammable, combustible and hazardous liquids through Chapter Comm 10 of the Wisconsin Administrative Code. These regulations protect the safety and health of the public. Comm 10 encompasses fire safety, life safety and environmental safety aspects for flammable, combustible and hazardous liquids, and includes registration requirements for tanks that contain these liquids.

Specific sections of the Comm 10 requirements are summarized below. This calendar concentrates on information specific to ***underground storage tank regulations at gasoline dispensing facilities*** (including gas stations). If you think you may be affected after reading this summary, be sure to read the full rule. More detailed information on this rule can be accessed through the web at *http://commerce.wi.gov/ER/ER-BST-HomePage.html*.

Commerce recently revised Comm 10. Changes to Comm 10 became effective February 1, 2009. These revisions were written in line with the Petroleum Equipment Institute (PEI) recommended practices. PEI's recommended practices represent a synthesis of industry procedures, manufacturers' recommendations and regulatory standards. The Comm 10 revisions include a number of phased-in deadlines for system upgrades. Underground storage tank owners should pay close attention to the upcoming deadlines listed below. Owners of aboveground storage tanks should review Comm 10 for additional upgrade deadlines.

The following summary highlights specific parts of Comm 10, including recordkeeping, reporting, leak detection, inventory verification, change of ownership, financial responsibility and training requirements. The summary outlined in this calendar can assist you in complying with the underground storage tank requirements in Comm 10, but shouldn't be used solely to interpret the rule. Owners of aboveground storage tanks should review Comm 10 for additional requirements specific to those tanks.

Does Comm 10 affect my business?

If you store, handle and/or transport flammable, combustible and hazardous liquids, you are affected by this rule. In addition, owner operators of 60 gallon and greater underground storage tanks and/or 110 gallon and greater aboveground storage tanks are regulated under Comm 10. This includes any business that sells gasoline or other liquid motor fuel for use in any type of internal combustion engine.

What are the different record keeping and reporting requirements I must meet?

This calendar can help you meet many of the following record keeping requirements. Forms for other reports and permit requirements may be obtained from the Wisconsin Department of Commerce's Storage Tank Regulations Section (see the Sources of Information on page 54).

What are the upcoming deadlines for Comm 10 requirements?

The Comm 10 revisions include several deadlines that will take effect during the next two years. Owners of underground storage tanks may need to plan ahead to comply with these requirements:

- ***February 1, 2011 — Auto shut-off overfill protection***

More information about this requirement can be found in the Spill and Overfill Prevention section below; see the portion on "What are the equipment requirements."

- ***January 1, 2012 — Designation of operator classes and operator training***

See the section below on Owner-Operator Training Requirements for more information about this part of the rule.

Introduction to Comm 10 revisions:

The Commerce tanks program has a summary of the Comm 10 revisions available online, at *http://commerce.wi.gov/ER/ER-BST-PL-ProgramLetterList.html*. Scroll down to the bottom of the page and select the presentation titled "WPMCA Comm 10 Revision Overview for Owners and Operators" (fall 2009; PDF format, 40Mb).

LEAK DETECTION REQUIREMENTS

"Leak detection" means determining whether a discharge of regulated substance has occurred from a storage tank system into the environment or into the interstitial space between the storage tank system and its secondary barrier or secondary containment around it at least every 30 days. Owner operators should maintain all records verifying this information.

What are the requirements for determining if leaks have occurred?

All new and existing underground tank systems used to store regulated

substances shall be provided with a method of leak detection. To maintain the effectiveness and accuracy of the leak detection equipment, annual verification and calibration of the leak detection equipment is required. This includes:
a. equipment for measuring product levels that is used for manual tank gauging
b. automatic tank gauging equipment
c. interstitial monitoring equipment
d. sensors used to detect leaks in tanks, lines or sumps

Owner operators should use the Commerce underground tank system release and leak monitoring form (ERS-10778) for annual monitoring equipment certification. This form should be kept on site. You can access the form at *http://commerce.wi.gov/ER/ER-BST-HomePage.html*.

Are there different leak detection methods I can use?
Comm 10 identifies the different leak detection methods acceptable. Tanks shall be monitored at least every 30 days for leaks using one of the following methods:
a. Inventory Control and Precision Tightness Testing (tanks less than 10 years old)
b. Manual Tank Gauging—tanks that have a capacity of more than 2,000 gallons may not use manual tank gauging as a method of required leak detection
c. Automatic Tank Gauging
e. Statistical Inventory Reconciliation
f. Interstitial Monitoring

What are the leak detection requirements for piping?
(a) Pressurized piping
Underground piping that conveys regulated substances under pressure shall comply with all of the following requirements unless all of the piping is visible:
1. The system shall be equipped with an automatic line leak detector.
2. Single-wall piping systems shall have at least one of the following leak detection methods:
   a. an annual precision tightness test
   b. monthly monitoring to the 0.2 gallon per hour rate
   c. statistical inventory reconciliation (SIR), in conjunction with tank SIR
3. Double-wall piping systems shall use at least one of the following leak detection methods:
   a. an annual precision tightness test
   b. monthly monitoring to the 0.2 gallon per hour rate
   c. statistical inventory reconciliation (SIR), in conjunction with tank SIR
   d. continuous interstitial monitoring (IM)
4. If a passing test using monthly monitoring is not achieved for 2 consecutive months, a precision tightness test shall be performed within 10 business days, and if the piping fails to pass that test, the site shall be assessed for the presence of a release.

(b) Suction piping
1. Piping which conveys regulated substances under suction and which is not entirely visible shall use one of the following leak detection methods:
   a. a precision tightness test conducted at least every 3 years
   b. interstitial monitoring
2. Leak detection may be omitted for suction piping that meets all of the following requirements:
   a. The below-grade piping operates at less than atmospheric pressure.
   b. The below-grade piping is sloped so that the contents of the pipe will drain back into the storage tank if the suction is released.
   c. Only one check valve is included in each suction line.
   d. The check valve is visibly located directly below and as close as practical to the suction pump.
   e. A method is provided that allows compliance to be readily observed or otherwise determined.

(c) Inventory control as leak detection
Tank systems may use monthly inventory control as leak detection if the tank is 10 years old or less, has a tightness test done at startup and every 5 years after installation until the tank is 10 years old, and has corrosion protection. Piping connected to a tank using inventory control shall comply with one of the following:
1. pressurized piping shall have leak detection
2. suction piping shall have leak detection

Leak detection methodology via groundwater monitoring and vapor monitoring are now restricted. Vapor and groundwater monitoring methods that were in place prior to February 1, 2009 will be allowed to continue until the equipment is not functioning as it should or the operator falls out of compliance with the respective methodology requirements.

For more information on leak detection requirements, owner operators should review Comm 10.510.

RECORD KEEPING REQUIREMENTS

What are the record keeping requirements for the storage and piping of underground storage tanks?
Operators of new and existing underground storage tank systems shall maintain all of the following records:

1. Documentation of any system repairs, alterations or upgrades, including software and hardware upgrades, and any inspections required under this chapter.
2. Documentation demonstrating conformance with leak detection requirements, and the manner in which these claims have been justified or tested by the equipment manufacturer and certified installer, including all of the following:
   a. Information pertaining to the leak detection system, including the material approval that was valid when the system was installed; operator manual;

warranty; and documentation verifying that the equipment has been installed, programmed and tested to perform as required by Comm 10.
b. Testing results obtained from leak detection equipment, as retained from the equipment's printer or a hand-written log kept on site.
c. Documentation maintained for all calibration, inspection, monitoring, testing, repair, and annual performance verification of leak detection equipment permanently located on site (form ERS-10778 UST Functionality Verification).

Records that Commerce tanks inspectors may request:

- Corrosion protection tests—sacrificial anode or impressed current (IC includes 60 day log)
- Line tests
- Tank tests
- Flow restrictors
- Internal inspections
- Equipment calibration (form ERS-10778 UST Functionality Verification)
- Alarm history (including how the person responsible responded to the alarm)
- Impact valves
- Continuity tests
- Inventory verification
- Monthly inspection records

3. Response to and investigation of leak detection alarms.
4. Documentation maintained for all calibration, inspection, monitoring, testing, repair, and periodic performance verification of any corrosion protection equipment permanently located on site.
5. Analysis from a corrosion expert of site corrosion potential if corrosion protection equipment is not used.
6. Records of any environmental information that has accrued for a site, such as from site inspections or investigations, phase I or II environmental site assessments, or repairs, or from tank-system site assessments responding to leaks, spills, overfills, releases and tank closures.
7. Documentation of product inventory verification.
8. Results of functional testing of impact and emergency shut-off valves.
9. Electrical continuity testing for dispensers of motor fuels that are Class I liquids.
10. One set of stamped, approved plans and specifications and a copy of the approval letter.

AVAILABILITY OF RECORDS

What do I need to do with the records?

1. Operators shall maintain the required records at the site.

2. Operators of unattended sites shall make the records available for inspection at the site when given 72 hours prior notice.

3. The approved plans, specifications and approval letter shall be kept on site and available to the authorized agent of Commerce during all phases of installation. After installation is completed, the approved plans, specifications and approval letter shall be made available to the authorized agent of Commerce upon request.

4. Records may be kept electronically, provided they are in a format acceptable to the department.

How long must I keep records?

Although it is suggested that you maintain all of the underground storage tank records for the life of the facility, the following information is required by Comm 10. Records shall be maintained for the following periods from the date of the most recent test, inspection or upgrade:

1. Monthly leak detection monitoring — 1 year
2. Annual precision tightness testing — 1 year
3. Periodic precision tightness testing in association with inventory control — until the next test is conducted
4. Impressed current corrosion protection system, 60-day inspection — the previous 3 inspections
5. Corrosion protection system, annual test — the previous 3 tests
6. Internal inspection associated with underground tank lining — 10 years
7. Annual performance verification of leak detection equipment and flow restrictor — 2 years
8. Results of functional testing of impact and emergency shut-off valves and electrical continuity testing for dispensers — 2 years
9. The owner's manual provided by the leak detection equipment manufacturer — until the leak detection system is replaced or no longer used
10. Any tank or pipe system modification or repair — life of the system
11. Inspection records — 3 years or the interval between required inspections, whichever is longer
12. Tank-system site assessments and other environmental assessments, such as assessments for property transactions — 3 years after completion of any permanent closure, upgrade, repair or change in service; these records shall be maintained at one of the following locations:
    a. With the owner or operator who took the UST system out of service
    b. With the current operator of the UST system site
    c. With the department if records cannot be maintained at the closed facility
13. Leak detection alarm investigation — 2 years
14. Product inventory verification — 10 years
15. One set of stamped, approved plans and specifications and a copy of the approval letter — life of the system

Note: All leak detection records should be retained. The documentation could be helpful to exclude the site as a possible source of contamination at a later date.

Do I need to keep records showing I have petroleum products in my storage tanks?
Yes, if your facility stores a petroleum product. Petroleum products include, but are not limited to: gasoline, gasoline-alcohol fuel blends, kerosene, fuel oil, burner oil, and diesel fuel oil.

What are the requirements for verifying and maintaining delivered petroleum products?
To verify and maintain the integrity of delivered products, product inventory verification shall be conducted monthly for the life of the tank system, and reconciled on a monthly basis, in the following manner:
(a) Inventory volume measurements for regulated substance inputs, withdrawals, and the amount still remaining in the tank are recorded each operating day.
(b) The equipment used is capable of measuring the level of product over the full range of the tank's height, to the nearest one-eighth of an inch.
(c) The regulated substance inputs are reconciled with delivery receipts by measurement of the tank inventory volume before and after delivery. Where blend pumps are used, reconciliation may address all tanks as a group rather than as individual tanks.
(d) Product dispensing is metered and recorded in accordance with applicable requirements.
(e) The measurement of any water level in the bottom of the tank is made to the nearest one-eighth of an inch at least once a month.

Reconciliation must be used to determine if a leak detection method failed or an unauthorized product mixing occurred.

SPILL AND OVERFILL PREVENTION AND RESPONSE

What are the requirements to prevent overfilling of storage tanks?
Prior to delivery, the operator of the fuel delivery equipment that is transferring the product shall ensure that the volume available in the tank is greater than the volume of product to be transferred to the tank. The transfer operation shall be monitored constantly by the operator of the delivery equipment so as to prevent overfilling and spilling.

Fuel delivery persons shall immediately inform the owner or operator of any overfilling or spilling which occurs during delivery.

What are the equipment requirements?
All underground storage tank systems, whether new or existing, must have a liquid-tight containment system or spill bucket with a minimum capacity of 5 gallons. The liquid-tight containment sump or spill bucket must be equipped with either a push-to-drain system that directs spill into the tank or a mechanism to pump product out of the sump.

Spill Reporting Requirements

Some aspects of spill response, especially spill reporting, are governed by requirements in other state and federal regulations. This is a brief summary of those requirements.

Do I have to report the spill?
Wisconsin statutes allow *de minimus* exemptions for small quantity spills that meet certain criteria. Both the characteristics of the spill and amount of spilled substances are considered when determining reporting requirements.

De minimus exemption of petroleum compounds applies **only** when the discharged substance:
- has evaporated or been cleaned up in accordance with state law
- does not adversely impact or threaten to adversely impact the air, lands, waters of the state as a single discharge, or when accumulated with past discharges
- does not cause or threaten to cause chronic/acute human health impacts
- does not present or threaten to present a fire or explosion or other safety hazard

The following petroleum discharges do not require notification to the DNR, if the spill meets the *de minimus* conditions above and the quantity spilled is:
- gasoline or another petroleum product that is completely contained on an impervious surface
- less than 1 gallon of gasoline onto a pervious surface or runs off an impervious surface
- less than 5 gallons of other petroleum products onto a pervious surface or runs off an impervious surface

Any spill with quantities less than the amounts mentioned above and that meets the *de minimus* conditions is exempt from reporting to the DNR. However, tanks program inspectors can still report spills if they see staining under dispensers, so it is important to have good housekeeping and spill prevention measures in place.

If a spill does not meet the exemptions above, the owner operator must report the spill to **Wisconsin's spills hotline at 800-943-0003**. This is a 24 hour per day, 7 day per week, phone number. The owner and operator are responsible for reporting. Penalties exist for failing to provide notice of reportable spills. Therefore, if in doubt about the quantity spilled, reporting is recommended. For more information about spills, visit *http://dnr.wi.gov/org/aw/rr/spills/*.

Is additional reporting required?
Certain spills trigger the federal Emergency Release Notification requirements described in section 304 of the Emergency Planning and Community Right-to-Know Act. The Department of Energy's Office of Health, Safety & Security has an online RQ Calculator at *http://homer.ornl.gov/rq/* to help you check reportable quantities and evaluate if your release must be reported to the National Response Center.

Who do I contact if additional reporting is required?
To report a spill that exceeds reportable quantities of federally listed hazardous substance(s), make the following three telephone calls:
- Wisconsin Spills Hotline, 800-943-0003 (same as above)
- National Response Center, 800-424-8802
- Local Emergency Planning Committee (LEPC), at your county Emergency Management Office (each county in Wisconsin has a LEPC)

In addition, all new and existing underground storage tank systems shall be equipped with storage tank overfill prevention equipment. The regulation requires dual overfill protection equipment that will:

(1) automatically shut off the flow into a tank when the tank is no more than 95% full; and
(2) alert the transfer operator when the tank is no more than 90% full, by restricting the flow into the tank or triggering a high-level alarm.

Existing tank systems must comply with this requirement by February 1, 2011; new systems must comply upon startup. More information on these requirements can found by reviewing Comm 10.505.

Note that retrofit equipment is available which complies with these requirements and which can be installed in a tank without removing pavement.

What is required if my facility experiences a gasoline spill?
Immediately upon discovery of any evidence of a leak from a tank system or dispensing system, the owner operator shall take all measures necessary to stop the leak, mitigate fire and explosion hazards, and prevent releases of any free product into the environment. You may be required to report the spill to the DNR.

OWNERSHIP AND INSURANCE INFORMATION

What are the requirements for a change of ownership?
An individual or company taking ownership of property with a storage tank shall notify Commerce of the change of ownership, including updated registration information and permit application, within 15 business days of completing the real estate transaction. All records that are required to be retained shall be transferred to the new owner or operator.

What are the financial responsibility (also referred to as pollution insurance) requirements for owners?
All gasoline dispensing facilities shall provide annual proof of financial responsibility in order to obtain a permit to operate. Financial responsibility means that the owner has sufficient financial backing to cover expenses due to cleanup or third-party liability that results from a leaking underground storage tank. Financial responsibility requirements vary depending on several factors. The amount of coverage a gasoline dispensing facility is required to have depends on the number of tanks owned and operated.

There are a number of mechanisms by which financial responsibility may be demonstrated. These mechanisms include, but are not limited to, guarantees, insurance and risk retention group coverage, surety bonds, trust funds and local government funds (e.g., government bonds, financial tests, guarantees, etc.).

Owner-Operator Training Requirements in Wisconsin's Comm 10 Rule

Why conduct owner-operator training?

Section 1524 of the Energy Policy Act of 2005 required the US Environmental Protection Agency (US EPA) to establish training requirements for the people responsible for operating and maintaining underground storage tank systems. Wisconsin's Comm 10 Subchapter VIII incorporates US EPA owner-operator training requirements.

Training will soon be available for all three distinct classes of operators who are involved in operating and maintaining these storage tank systems. See the table below for information about Class A, B and C operators. Entities planning to provide training will need to have their training plans approved by Commerce.

What are the training requirements?

Operator training includes an evaluation of an operator's knowledge of applicable requirements. Methods for meeting the requirements for Class A and B operators include having either of the following:

(1) a certificate issued by the International Code Council® showing an individual has passed the Wisconsin underground storage tank operator examination; or
(2) written proof of successful completion of an equivalent, alternate operator training and testing program that has received prior approval from the Department of Commerce. Alternate programs will include an evaluation of operator knowledge through testing, practical demonstration or other tools that Commerce determines are acceptable.

Class C operators must obtain training and a certificate from the accredited Class A or Class B facility operator where the Class C operator is employed indicating the Class C operator has successfully completed training for the facility.

When is the training required?

By January 1, 2012, each new or existing underground storage tank system must have designated a Class A operator, a Class B operator and a Class C operator, and these operators must be trained.

Small businesses have until August 8, 2012 to meet this requirement. 'Small business' means a business entity, including its affiliates, which is independently owned and operated and not dominant in its field, and which employs 25 or fewer full-time employees or which has gross annual sales of less than $5,000,000.

What are the record keeping requirements?

The owner or operator must maintain operator documentation at the underground storage tank system site and have it immediately available for inspection by an authorized agent of Commerce. In addition, the Department of Commerce is using a reporting system to identify those who are listed by each company as the Class A and Class B operators. The database will track the training and tests that each individual completed.

Are there retraining requirements?

Yes. If Commerce determines that an underground storage tank system is not in significant compliance, the Class B operator must be retrained within 60 days or another time period prescribed by the Department of Commerce, in the areas that are determined to not be in compliance.

Where can I find more information about this training requirement?

The Department of Commerce has information, including frequently asked questions, available at *http://commerce.wi.gov/ER/ER-BST-FedRegUST_OperatorTraining.html*. EPA has background information available at *http://www.epa.gov/oust/fedlaws/optraing.htm*.

Classes of Operators that Require Training and Training Requirements

	Class A Operator	Class B Operator	Class C Operator
Who fits this class of operator?	The individual who generally focuses on the statutory and regulatory requirements related to operating and maintaining the underground storage tank system (e.g., owner, environmental manager).	The individual who is generally responsible for field implementation of applicable underground storage tank regulatory requirements and implements day-to-day aspects of operating, maintaining, and recordkeeping for underground storage tanks at one or more facilities (owner, facility manager).	The individual who is generally the first line of response to events indicating emergency conditions or who responds to alarms (e.g., employee who is the first line of response in the case of an emergency).
What is the objective of the training requirements?	Ensure broad knowledge of regulatory requirements	Ensure in-depth knowledge of implementing regulatory requirements	Ensure knowledge of actions to take in the event of a leak or other emergency
What will the training include (at a minimum)?	• Spill prevention • Overfill prevention • Release detection • Corrosion protection • Emergency response • Product compatibility • Financial responsibility • Notification requirements • Release and suspected release reporting • Temporary and permanent closure requirements • Operator training requirements	• Spill prevention • Overfill prevention • Release detection • Corrosion protection • Emergency response • Product compatibility • Reporting and recordkeeping requirements	• Taking action measures in response to emergencies, such as situations posing an immediate danger or threat to the public or to the environment and that require immediate action

Weekly Inspection Checklist
for Underground Storage Tanks & Gasoline Dispensing Equipment

Inspection Point	Inspected?	Repaired?	Repair Logged on Maintenance Record?
Underground storage tanks and loading equipment (Stage I vapor recovery)			
Spill containment buckets ❑ clean and dry; no liquid in bottom; no solid debris; vapor tight ❑ remove liquid if present	Y N	Y N	Y N
Caps and gaskets ❑ locking caps on fill and vapor tubes locked in place; gasket in place and secure	Y N	Y N	Y N
Fill tubes ❑ not damaged bent, or loose; UST fittings on product fill tubes and vapor tubes secure, in place, without damage or leaks	Y N	Y N	Y N
Pressure vacuum valves ❑ vent installed and not damaged; no vapor escape from vent tubes (visual inspection); pipes not bent, damaged, or obstructed by any objects	Y N	Y N	Y N
Poppets ❑ not broken; check for tight seals	Y N	Y N	Y N
Gasoline dispensing equipment (Stage II vapor recovery)			
Pumps ❑ no signs of vapor or liquid leaks ❑ approved operating and warning labels are present and visible	Y N	Y N	Y N
Nozzles ❑ spouts not bent, worn, dented, loose or leaking; latch and trigger working properly ❑ vapor recovery holes clear and unblocked (if applicable) ❑ auto shutoffs working properly	Y N	Y N	Y N
Vapor guards, boots, facecones, faceplates and bellows (if applicable) ❑ no rips or tears; not loose from nozzle; faceplate not torn	Y N	Y N	Y N
Hoses ❑ proper length; no kinks, flat spots, tears or cuts	Y N	Y N	Y N
Breakaways ❑ secure and tight; no signs of leaks	Y N	Y N	Y N
Swivels ❑ firmly attached; move freely; no signs of leaks	Y N	Y N	Y N
Poppets (impact valve, vapor line) ❑ not broken; check for tight seals	Y N	Y N	Y N
Signs on dispensers ❑ “Do Not Top Off” and DNR phone (800-453-0645) clearly posted on dispensers	Y N	Y N	Y N
Healy or Hasstech monitor (if applicable) ❑ check for failure or error codes	Y N	Y N	Y N

Monthly Walk-Through & Inspection Checklist
for Underground Storage Tanks & Gasoline Dispensing Equipment

At least monthly, conduct basic walk-through inspections of your facility to make sure that your essential equipment is working properly and that you have release response supplies on hand. These inspections can provide a quick overview of your equipment and anything you may need to do. Perform the monthly inspection on the last working day of the month. In addition to the items on the weekly inspection checklist, you should also check for defects in the areas below.

The first section of this monthly checklist contains the basic inspection areas applicable to all gas stations. The second section contains inspection areas that are required for facilities in the nine counties of the Stage II vapor recovery area.

To document your walk-through checks, record the date of each monthly inspection under the month name. For each device/system inspected, mark whether the device/system was working properly (for example, “ok”) or was defective and needed repair (for example, “not ok” or “needs repair”). Initial your entries, especially if more than one person performs inspections. Then, make sure to keep records of all your repairs and record the dates and parts repaired/replaced on your maintenance log.

Inspection Point	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Inspection Date												
Underground storage tanks and gasoline dispensing equipment												
Release Detection System ❑ Inspect for proper operation. Run quick “self-test” of ATG to verify correct operation, or check manual dip stick for wear or warping.												
Spill Buckets ❑ Ensure spill buckets are clean and empty.												
Overfill Alarm ❑ Inspect for proper operation. Make sure alarm is easily seen and heard.												
Impressed Current Cathodic Protection System ❑ Inspect for proper operation. Check and log rectifier at least every 60 days.												
Fill and Monitoring Ports ❑ Inspect to make sure covers and caps are tightly sealed and locked.												
Spill and Overfill Response Supplies ❑ Inventory emergency spill response supplies and restock if supplies are low. Inspect supplies for deterioration and improper functioning.												

Monthly Walk-Through & Inspection Checklist (continued)

Inspection Point	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Inspection Date												
Dispenser Hoses, Nozzles, and Breakaways ❑ Inspect for loose fittings, deterioration, obvious signs of leakage, or improper functioning.												
Dispensers and Dispenser Sumps ❑ Open each dispenser and inspect visible piping, fittings, and couplings for signs of leakage. If any water or product is present, remove and dispose of it properly. Remove debris from sump.												
Piping Sumps ❑ Inspect visible piping, fittings, and couplings for signs of leakage. If any water or product is present, remove and dispose of it properly. Remove debris from sump.												
Gasoline dispensing equipment in Stage II vapor recovery areas												
Vapor Return Line ❑ Make sure line is not crimped, flattened, or blocked, and has no holes or slits. Make sure poppets work properly and seal tightly. Inspect breakaways and swivels.												
Nozzle Bellows ❑ Inspect to ensure there are no holes larger than 0.25" or slits larger than 1" (if applicable).												
Nozzle Faceplate or Facecone ❑ Inspect to ensure it is not torn or missing more than 25% of its surface (if applicable).												
Nozzle ❑ Inspect to make sure it is operating property and has an automatic overfill control mechanism.												
Vapor Processing Unit ❑ Check for defects including leaking return line, intermittent process interruptions, low vapor pressure in return to tank line, or inoperable Stage I control, e.g., pressure vacuum vent.												

Gasoline Inventory Tracking & Verification Worksheet

Month & year						Facility				
Type of product:						Address				
Tank capacity						Tank number				
Date	Opening inventory (inches / gallons)		Amount delivered	Amount sold	Calculated inventory	Closing inventory	Daily variance (±)	Cumulative variance (±)	Water depth (to 1/8 inch)	Initials
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										
19										
20										
21										
22										
23										
24										
25										
26										
27										
28										
29										
30										
31										
Totals										
If using Inventory Control, allowable variance -->								**Meet requirements?**		Y N

You can copy this worksheet as needed, or download an electronic version (Excel format) from *http://commerce.wi.gov/ER/ER-BST-InventoryControlRecordTemplates.html*.

Using the Worksheet

To use this worksheet, record gasoline amounts in gallons every day for Opening inventory, Gasoline delivered into the tank, Gasoline sold, and Closing inventory. When checking for water in the tank, record Water depth to 1/8 inch. Initial your entries for each day.

To keep track of your monthly throughput and perform inventory verification, do these calculations as follows and record the amounts on the worksheet:

Monthly total gasoline delivered or sold for this tank = sum of gasoline delivered or sold on all days during the month.

Monthly gasoline throughput = total gasoline delivered or sold during the month.

Calculated inventory = Opening inventory + Gasoline delivered – Gasoline sold.

Daily variance = Closing inventory – Calculated inventory.

Monthly total variance = sum of daily variances for all days of the month.

Cumulative variance = yesterday's cumulative variance + today's daily variance.

For Inventory Control, Allowable variance = 0.005 x Monthly total gasoline sold.

Inventory verification—reconcile your measurements every month to determine whether:

- a leak detection method has failed,
- unauthorized product mixing has occurred, or
- theft of product has occurred.

Definitions

This section contains definitions for many of the terms that appear in the three regulations: EPA's NESHAP, Wisconsin's NR 420, and the Comm 10 tanks rule. Several definitions below are included in the changes and clarifications that EPA proposed recently. Definitions from the federal rule that have not been finalized yet are marked with the notation [*proposed 12-15-2009*].

Area source means a facility that emits less than 10 tons per year of a single toxic air pollutant, or less than 25 tons per year of any combination of toxic air pollutants.

Bottom filling means the filling of a tank truck or stationary storage tank through an opening that is near or flush with the tank bottom.

California Air Resources Board certified means a vapor recovery system or system component that has been certified by the California air resources board pursuant to section 41954 of the California health and safety code.

Delivery vessel means a tank truck or trailer or a railroad tank car equipped with a storage tank used for transporting gasoline from sources of supply to stationary storage tanks at gasoline dispensing facilities.

Dual-point vapor balance system means a type of vapor balance system in which the storage tank is equipped with an entry port for a gasoline fill pipe and a separate exit port for a vapor connection.

Gasoline means any petroleum distillate or petroleum distillate/alcohol blend having a Reid vapor pressure of 27.6 kilopascals or greater which is used as a fuel for internal combustion engines. [*proposed 12-15-2009*]

Gasoline cargo tank means a delivery tank truck or railcar which is loading or unloading gasoline or which has loaded or unloaded gasoline on the immediately previous load. [*proposed 12-15-2009*]

Gasoline dispensing facility (GDF) means any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle, motor vehicle engine, nonroad vehicle, or nonroad engine, including a nonroad vehicle or nonroad engine used solely for competition. These facilities include, but are not limited to, facilities that dispense gasoline into on- and off-road, street, or highway motor vehicles, lawn equipment, boats, test engines, landscaping equipment, generators, pumps, and other gasoline-fueled engines and equipment. [*proposed 12-15-2009*]

Inventory controls means techniques used to identify a loss of product that are based on volumetric measurements in the tank and reconciliation of those measurements with product delivery and withdrawal records.

Leak detection means determining whether gasoline has been discharged from a storage tank system into the environment or into the interstitial space between the storage tank system and its secondary barrier or the secondary containment around it. Leak detection also means determining that your tank is not leaking at least every 30 days; the owner or operator must maintain a record of such verification.

Leaking component means any component which has a VOC concentration exceeding 10,000 ppm when tested in the manner approved by DNR.

Liquid tight means having a liquid leak rate not exceeding 0.10 gallons per hour when measured with 5% accuracy.

Monthly throughput means the total volume of gasoline that is loaded into, or dispensed from, all gasoline storage tanks at each GDF during a month. The definitions of throughput in the federal EPA rule and Wisconsin's NR 420 differ somewhat:

- In the federal rule, EPA has proposed that monthly throughput is calculated by summing the volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at each GDF during the current day, plus the total volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at each GDF during the previous 364 days, and then dividing that sum by 12 [*proposed 12-15-2009*].
- In Wisconsin's rule, DNR defines average monthly throughput as the amount of gasoline dispensed per month, on average, for any 24 month period beginning with calendar years 1991 and 1992; any period of time when the facility was non-operational must be excluded from the calculation.

Motor vehicle means any self-propelled vehicle designed for transporting persons or property on a street or highway. [*proposed 12-15-2009*]

Nonroad engine means an internal combustion engine (including the fuel system) that is not used in a motor vehicle or a vehicle used solely for competition, or that is not subject to standards promulgated under section 7411 of this title or section 7521 of this title. [*proposed 12-15-2009*]

Nonroad vehicle means a vehicle that is powered by a nonroad engine and that is not a motor vehicle or a vehicle used solely for competition. [*proposed 12-15-2009*]

Definitions (continued)

Reconstruction means the replacement of components at a facility to such an extent that (1) the fixed capital cost of the new components exceeds 50% of the fixed capital cost that would be required to construct a comparable new source; and (2) it is technologically and economically feasible for the reconstructed source to meet the relevant standard(s) established by EPA or DNR. Upon reconstruction, an affected source, or a stationary source that becomes an affected source, is subject to relevant standards for new sources, including compliance dates.

Stage I vapor recovery means a control method to capture gasoline vapors that are released when gasoline is delivered to a storage tank. Instead of being released to the air, the vapors are captured and returned to the tank truck as the storage tank is being filled with fuel, where they can be transported back to the terminal vapor processor for recovery or destruction.

Stage II vapor recovery means a control method that captures gasoline vapor that would otherwise escape into the air when motorists refuel their vehicles. Using special dispensing nozzles fitted with vapor return lines, vapors are returned through the pump hose to the gasoline storage tank instead of being released into the air.

Submerged filling means the filling of a gasoline storage tank through a submerged fill pipe or drop tube with a discharge that is within the applicable distance specified in the rule(s) from the bottom of the tank. Bottom filling of gasoline storage tanks is included in this definition.

Top off means to attempt to dispense more gasoline to a motor vehicle fuel tank after the vapor recovery dispensing nozzle has shut off.

Vapor balance system means a combination of pipes and hoses that create a closed system between the vapor spaces of an unloading gasoline cargo tank and a receiving storage tank such that vapors displaced from the storage tank are transferred to the gasoline cargo tank being unloaded.

Vapor control or vapor recovery system means a system that gathers organic compound vapors released during the operation of any transfer, storage, or process equipment and processes the vapors so as to prevent their emission into the ambient air.

Vapor recovery assist system means a vapor control system which employs a pump, blower or other vacuum inducing device to collect or process vapors generated during motor vehicle fueling operations.

Vapor tight means equipment that allows no loss of vapors. Compliance with vapor tight requirements can be determined by checking to ensure that the concentration of vapors at a potential leak source does not exceed specified limits, when measured at a distance of one inch from the source.

Vapor-tight gasoline cargo tank means a gasoline cargo tank which has demonstrated within the 12 preceding months that it meets the annual certification test requirements that are specified in the rule. [*proposed 12-15-2009*]

Sources of Information

- **Wisconsin Department of Commerce**

  Storage Tank Regulation Section, *http://commerce.wi.gov/ER/ER-BST-HomePage.html*

  Commerce Storage Tank staff, see map below, or look up county contacts online at *http://commerce.wi.gov/ER/ER-BST-StaffStateMap.html*

  Inspection and maintenance procedures—Recommended Practices for Inspection and Maintenance of Motor Fuel Dispensing Equipment (RP 500) and Recommended Practices for Inspection and Maintenance of Underground Storage Tank (UST) Systems (RP 900) available from Petroleum Equipment Institute (see below for web site); note that PEI charges a fee for these handbooks

- **Wisconsin Department of Natural Resources**

  Gasoline Vapor Recovery (Stages I and II), *http://dnr.wi.gov/air/mobile/stage2/index.html*

  For information in all Stage I and Stage II vapor recovery areas, contact Randy Reading, at randy.reading@wisconsin.gov or 414-263-8572.

  For DNR approved employee training, contact Wisconsin Petroleum Marketers at 608-256-7555

Sources of Information (continued)

- **US Environmental Protection Agency**
  Office of Underground Storage Tanks, *http://www.epa.gov/OUST/*
  Owner-operator training,
  http://www.epa.gov/oust/fedlaws/optraing.htm
  Underground Storage Tank/Leaking Underground Storage Tank Program Status In Wisconsin,
  http://www.epa.gov/OUST/states/wi.htm

- American Petroleum Institute (API), *www.api.org*; Wisconsin Petroleum Council (state chapter), 608-256-3312
- American Society of Testing and Materials (ASTM), *www.astm.org*
- Axxis, *www.axxispetro.com*
- Fiberglass Tank and Pipe Institute (FTPI), *www.fiberglasstankandpipe.com*
- NACE International—The Corrosion Society, *www.nace.org*
- National Association of Convenience Stores, *www.nacsonline.com*
- National Association of Truck Stop Operators (NATSO), *www.natso.com*
- National Fire Protection Association (NFPA), *www.nfpa.org*
- Petroleum Equipment Institute (PEI), *www.pei.org*
- Petroleum Equipment Contractors Association of NJ, *www.peca.net*
- Petroleum Marketers Association of America (PMAA), *www.pmaa.org*
- Society of Independent Gasoline Marketers of America (SIGMA), *www.sigma.org*
- Steel Tank Institute (STI), *www.steeltank.com*
- Underwriters Laboratories (UL), *www.ul.com*
- US Department of Energy Energy Information Administration petroleum site, *www.eia.doe.gov/oil_gas/petroleum/info_glance/petroleum.html*
- Wisconsin Petroleum Marketers & Convenience Store Association (WMPCA), *www.wpmca.org*

PETROLEUM INSPECTION DISTRICTS

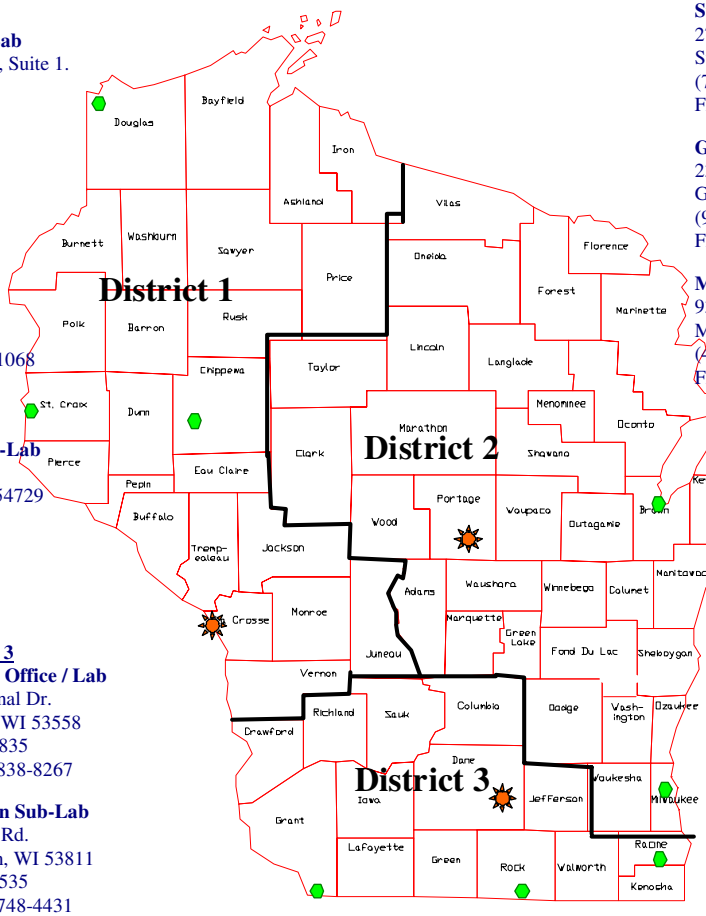
Wisconsin Environmental and Regulatory Services Division
Bureau of Petroleum Products and Tanks

DISTRICT 1
La Crosse Office / Lab
3824 Creekside Lane, Suite 1.
Holmen, WI 54636
(608) 785-9312
FAX (608) 789-7851

Hudson Sub-Lab
21 2nd St.
Hudson, WI 54016
(715) 381-5115
FAX (715) 381-5118

Superior Sub-Lab
1701 N. 4th St.
Superior, WI 54880-1068
(715) 392-7839
FAX (715) 392-7893

Chippewa Falls Sub-Lab
10 Sunshine Circle
Chippewa Falls, WI 54729
(715) 726-2559
FAX (715) 726-2555



DISTRICT 2
Stevens Point Office / Lab
2715 Post Rd.
Stevens Point, WI 54481
(715) 344-1970
FAX (715) 345-5269

Green Bay Sub-Lab
2331 San Luis Place
Green Bay, WI 54304
(920) 492-5600
FAX (920) 492-5604

Milwaukee Sub-Lab
9316 N. 107th St.
Milwaukee, WI 53224
(414) 371-5670
FAX (414) 371-5672

DISTRICT 3
McFarland Office / Lab
4001 Terminal Dr.
McFarland, WI 53558
(608) 838-7835
FAX (608) 838-8267

Hazel Green Sub-Lab
489 Badger Rd.
Hazel Green, WI 53811
(608) 748-4535
FAX (608) 748-4431

Janesville Sub-Lab
2514 Morse St.
Janesville, WI 53545-0249
(608) 758-4931
FAX (608) 758-4935

Sturtevant Sub-Lab
9531 Rayne Rd., Suite 5
Sturtevant, WI 53177-1833
(262) 884-2436
FAX (262) 884-2438

District Laboratory / Office
Sub-Laboratories

Assistance Available for Gasoline Dispensing Facilities

Wisconsin Department of Commerce
Storage Tank Regulation Section, Environmental and Regulatory Services
The Storage Tank Regulation Section is the primary unit responsible for the administration and regulation of Chapter Comm 10 of the Wisconsin Administrative Code—Flammable, Combustible and Hazardous Liquids. For more information on the Storage Tank Regulation Section, visit *http://commerce.wi.gov/ER/ER-BST-HomePage.html*.

Small Business Clean Air Assistance Program (SBCAAP)
The SBCAAP provides confidential, non-regulatory and free information to Wisconsin small businesses to help them understand their air pollution compliance requirements. The program has fact sheets, recordkeeping and reporting tools, EPA compliance documents and videos, DNR required forms, and permit applications, all available free of charge. For more information, contact Tom Coogan at 608-267-9214 or Beth Goldowitz at 608-261-6554, or visit *http://commerce.wi.gov/sbcaap*.

Wisconsin Department of Natural Resources
Air Management Program
The Air Management Program regulates Chapter NR 420 of the Wisconsin Administrative Code—Control of Organic Compound Emissions from Petroleum and Gasoline Sources. For more information about the Air Management Program, visit *http://dnr.wi.gov/air/*. For more information about the Stage I/Stage II requirements in the rule regulating organic compound emissions from petroleum and gasoline sources, contact Randy Reading, Air Management Specialist, at Randy.Reading@Wisconsin.gov or 414-263-8572.

Wisconsin Petroleum Marketers & Convenience Store Association (WPMCA)
WPMCA represents more than 2,000 independently owned and operated petroleum retailers throughout the state. WPMCA keeps its members informed about issues that are relevant to this industry; helps members to share useful information; reinforces the importance of independent businesses in our communities; and educates policy makers about the industry's needs. WPMCA also offers various environmental training programs for compliance with rules like Comm 10 and NR 420. To learn more, call 888-856-7555 or visit *http://www.wpmca.org*.